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June 28, 2023

Army Environmental Division – BRAC Ops Branch

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

RE: Final Northern Area Groundwater RCRA Facility Investigation Report, Revision 2, Fort Wingate Depot Activity, McKinley County, New Mexico  
Army's Response to the New Mexico Environment Department Third Letter of Disapproval dated March 27, 2023, EPA# NM6213820974, HWB-FWDA-21-004

Dear Mr. Maestas:

This letter is in reply to the New Mexico Environment Department (NMED) Third Letter of Disapproval dated March 27, 2023, reference number HWB-FWDA-21-004, Final Northern Area Groundwater RCRA Facility Investigation Report, Revision 2, dated December 19, 2022. The following are Army's responses to NMED comments, detailing where each comment was addressed and cross referencing the numbered NMED comments. In addition to the comment responses provided in this letter, two (2) hard copies and two (2) electronic (CD) copies of the Final Northern Area Groundwater RFI Report, Revision 3, including a redline strikeout version, are enclosed for your review and consideration.

**Comments:**

**1. Permittee's Response to NMED's Second Disapproval Comment 1, dated July 25, 2022**

**Permittee Statement:** "The Army will propose to implement parts (a)-(c) of NMED's comment in Phase 2 Groundwater RFI Work Plan, with a proposed submittal date of October 30, 2023."

**NMED Comment:** The Permittee proposes to (a) define what analytes constitute naturally occurring organic compounds; (b) collect groundwater samples from the new wells where total petroleum hydrocarbon (TPH) gasoline range organics (GRO) and diesel range organics (ORO) were detected; and (c) conduct TPH-DRO/GRO, volatile organic compound (VOC), and semi-volatile organic compound (SVOC) analyses with and without use of silica gel cleanup for at least two consecutive sampling events in the Phase 2 Groundwater RFI Work Plan that is planned to be submitted in October 30, 2023, as stated. However, TPH detected in the new wells may be considered contaminants of concern (COCs) or fuel constituents unless proven otherwise. Accordingly, the Permittee must continue to collect groundwater samples from the new wells where TPH-DRO/GRO were detected for TPH-DRO/GRO, VOC, and SVOC analyses, as well as specific analyses required for each well

during the upcoming groundwater periodic monitoring events. Regarding the proposed submittal date of this investigative work plan (i.e., October 30, 2023), NMED finds it acceptable. The Permittee must submit the proposed work plan for NMED review no later than **October 30, 2023**, as stated. Revise the Report to include this provision.

**Army Response:** Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Plan by March 15, 2024.

**2. Permittee's Response to NMED's Second Disapproval Comment 1, dated July 25, 2022**

**Permittee's Statement:** "Section 5.3.5.1 was revised to incorporate the assumption that the TPH detections are due to interference from organics, see page 5-11, lines 4 and 26."

**NMED Comment:** Section 5.3.5.1 asserts that the TPH detections were assumed to be caused by the presence of organic matter rather than hydrocarbon constituents or potential COCs; however, the statement is not supported and does not address the NMED's July 22, 2022 Second Disapproval Comment 1 that states, "it is premature to conclude that naturally occurring organic compounds are the sole source of the detections," and "revise the Report to remove unproven assertions and propose the required analysis detailed above." The assertions are not proven unless they are demonstrated to be true. The revision to Section 5.3.5.1 remains misleading. NMED's Second Disapproval Comment 1 must be addressed in the revised Report. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

**Army Response:** Concur. Section ES-2.3, page ES-4, lines 17-18 and Section 5.3.5.1, page 5-11, were revised to remove statements that the detections were not due to diesel fuel contamination. Per the recommendation in Section 6.3.5, and consistent with the Army's response to NMED comment #1 above, the Army will propose to analyze samples with and without the use of silica gel cleanup for at least two consecutive sampling events in the Phase 2 Groundwater RFI Work Plan.

**3. Permittee's Response to NMED's Second Disapproval Comment 2, dated July 25, 2023**

**Permittee Statement:** "The Army acknowledges that aluminum may have been released in the Administration Area at AOC 47 as part of a spill of a photoflash compound. No other releases of metals are known to have occurred within the Study Area."

**NMED Comment:** The statement does not appear to be accurate. Metals other than aluminum have previously been released at the facility. For example, lead was released from the paint used to prevent corrosion at the igloo swales and was identified in soils adjacent to buildings in the Administration Area. Revise all relevant sections of the Report for accuracy. In addition, some explosives handled at the facility may potentially have been formulated with metals (e.g., barium, aluminum). In this case, since explosive compounds have been released at the facility, metals formulated for some explosives may have also been released to the environment. The concentrations of some explosive compounds in soil or groundwater samples may correlate with those of the metals. Evaluate whether such correlation is present and provide a discussion in the revised Report. In addition, the Permittee can attain records of the explosives handled at the facility, provide the information in the revised Report.

**Army Response:** Concur. "No other releases of metals are known to have occurred within the Study Area" has been removed from two locations in Section 5.3.6.1, page 5-13, lines 1-2 and lines 17-18. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Plan by March 15, 2024, to address remaining data gaps with respect to Northern Area groundwater.

**4. Permittee's Response to NMED's Second Disapproval Comment 4, dated July 25, 2022**

**Permittee Statement:** "Aluminum may have been released in the Administration Area at AOC 47 as part of a documented spill of photoflash compound. Due to the number of monitoring wells in this area, no additional investigative activities are recommended for metals."

**NMED Comment:** Since Comment 13 in the NMED's January 25, 2022, Disapproval requires an investigation for the presence of potential groundwater contamination in the bedrock aquifer beneath the Administration Area, propose to investigate potential contamination associated with the aluminum release in the bedrock aquifer beneath the Administration Area in the relevant work plan submittal. No revision is required to the Report.

**Army Response:** Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Plan by March 15, 2024.

**5. Permittee's Response to NMED's Second Disapproval Comment 5a, dated July 25, 2022**

**Permittee Statement:** "The boring log for TMW51 was reviewed and found to be in error. The field log for TMW51 reports the bottom 10 feet of the boring as claystone. The boring log for TMW51 presented in Appendix B has been revised."

**NMED Comment:** Appendix B (Field Forms), does not contain the field log for TMW51 or any field record associated with observation of the soil borings. Include the relevant field logs in the revised Report. In addition, a hardcopy of the Report indicates that Appendix E2 contains the wellhead photographs in the compact disks; however, the electronic files titled as "E-2" in the compact disks contain cross section diagrams rather than wellhead Photographs. Include the missing information in the revised Report.

**Army Response:** Concur. The Army response to NMED comment 5a, dated December 19, 2022, regarding the boring log for TMW51 being presented in Appendix B, was in error. Please note that the boring log for TMW51 is presented in Appendix E. No changes to the report were made as this typographical error was only in the comment response letter dated December 19, 2022.

**6. Permittee's Response to NMED's Second Disapproval Comment 5b, dated July 25, 2022**

**Permittee Statement:** "TMW64 was incorrectly designated as being completed in BR1. Review of the boring log shows that the boring passed through 25 feet of claystone (20 - 45 feet bgs) prior to encountering sandstone to the total depth of 101 feet. This claystone is the distinctive lithologic unit between BR1 and BR2."

**NMED Comment:** According to Table 4-2.1 (Monitoring Well Construction Details), wells TMW51, TMW52, and TMW53 are designated as BR1 wells. The boring logs for wells TMW51, TMW52, and TMW53 included in Appendix E1 indicate that a layer(s) of claystone lies on top of sandstone, which is similar to that of TMW64. Explain why wells TMW51, TMW52, and TMW53 remain as BR1 wells while well TMW64 was changed to be a BR2 well in the revised Report.

**Army Response:** Concur. The designation of TMW64 is correctly identified as a BR2 well. The BR1 and BR2 zones were determined during previous PMR reports and the NMED-approved Work Plan and are used as convention in this RFI. The following explanation for the designation of TMW64 was added to Section 4.2.2, page 4-2, lines 12-14:

"TMW64 is located in the southern portion of the Study Area where the BR1 unit does not exist due to the steeply dipping beds. At this location, the screened interval is in the lower portion of the BR2 unit."

**7. Permittee's Response to NMED's Second Disapproval Comment 5c, dated July 25, 2022**

**Permittee Statement:** "Tables 4-2.1 and 4-2.2, 4-2.3, 4-2.4, 4-3.4, 4-5.1, 4-7.1, 4-7.3, 4-7.4, have been revised to designate TMW64 as being completed in BR2."

**NMED Comment:** Table 4-3.4 (Groundwater Analytical Detections - VOCs) and Table 4-7.3 {Groundwater Analytical Detections - Metals) designates well TMW64 as being completed in BR1. Correct the typographical errors in the revised Report. In addition, the typographical error in Table 4-7.3 was found on page 46 of 53, row 42 in the electronic file titled as "Sec\_4\_Tables-October\_2022". However, since a hardcopy of the Report does not provide page numbers in the Tables, the errors cannot be referenced to the specific page number. Provide page numbers in all tables in the revised Report, as previously directed by NMED and as required for all submittals. Numbering pages is standard practice for document production. The Permittee must review documents produced by its contractors prior to submittal.

**Army Response:** Concur. Table 4-3.4 designates TMW64 as being completed in BR2, though Table 4-7.3 was revised to change designation of TMW64 from BR1 to BR2.

**8. Permittee's Response to NMED's Second Disapproval Comment 5d, dated July, 25, 2022**

**Permittee Statement:** "Figures 2-3.5a and 2-3. 5b have been revised to identify BR1 and BR2. Figures 4-2.2, 4-2.3, 4-3.4, have been revised to designate TMW64 as being completed in BR2."

**NMED Comment:** Figures 2-3.5a and 2.3.5b present the cross sections at the site intended to identify BR1 and BR2; however, the number of data points (i.e., borings) that estimates the extent and thickness of separate sandstone layers are inadequate. In addition, NMED previously commented that both lithology of the bedrock formation and groundwater flow direction have not been fully characterized in the bedrock aquifer(s) beneath the Workshop Area. Unless adequate data is collected, interpretation provided in the cross sections remains speculative. Either remove the figures from the revised Report or provide adequate

data to support the interpretation in the revised Report.

**Army Response:** Comment Noted. The Cross-Sections referenced in Figure 2-3.5a and 2-3.5b have been removed from the Report.

**9. Permittee's Response to NMED's Second Disapproval Comment 7, dated July 25, 2022**

**Permittee Statement:** "The Army remains concerned regarding the potential for cross contamination between the alluvial and bedrock aquifers that may occur during drilling or after installation of a groundwater monitoring well through the alluvial aquifer to the bedrock aquifer. However, the Army will include assessment for the presence of potential groundwater contamination in the Administration Area in the Phase 2 Groundwater RFI Work Plan. The Army is pursuing a comprehensive approach to contracting for upcoming related requirements at FWDA that is requiring additional time to develop. The Army is therefore respectfully requesting to revise the proposed submittal date for the Phase 2 Groundwater RFI Work Plan to October 30, 2023."

**NMED Comment:** NMED's Second Disapproval Comment 7 states, "if deep wells are installed using appropriate methods, potential cross contamination between aquifers should not occur." It is not clear why the Permittee remains concerned about the cross-contamination potential since methods exist to prevent the occurrence. Although the Permittee remains concerned, it concurs with installation of a deep well in the Administration Area. Although multiple bedrock wells were already installed in the Workshop Area, cross contamination has not occurred. Explain the basis for the concern in the revised Report. In addition, the Permittee requests that the submittal date of the work plan be extended from February 20, 2023, to October 30, 2023. NMED's Second Disapproval Comment 7 states, "although this comment remains valid, the Permittee's June 28, 2022 supplemental correspondence proposes to submit a work plan by July 30, 2023 due to the Permittee's contracting schedule. Since the Permittee has already had time to initiate the contracting process, an additional year to award a contract is excessive. Accordingly, the Permittee must submit a work plan to investigate the presence of potential groundwater contamination in the bedrock aquifer beneath the Administration Area no later than February 20, 2023 rather than June 30, 2022."

The Permittee now requests another extension until October 30, 2023. Submit a separate letter work plan for this investigation rather than requesting another extension. Regardless, the original due date of February 20, 2023, has already passed; therefore, the Permittee is out of compliance and may be subject to an enforcement action. The Permittee must submit the required and past due work plan.

**Army Response:** Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Pan by March 15, 2024.

**10. Permittee's Response to NMED's Second Disapproval Comment 8, dated July 25, 2022**

**Permittee Statement:** "The text at sections Section 2.4.2.2.7, lines 33-35, page 2-14, and lines 6-8, page 2-15, and Section 2.4.4.2.1, lines 27-29, page 2-21, and lines 13-14, page 2-22 have been revised to state '...with residual nitrate and explosives contamination below an approximate depth of 35 feet.'"

**NMED Comment:** The full revised text in the section's states, "the excavated area was then backfilled and compacted with clean soil and regraded with residual nitrate and explosives contamination below an approximate depth of 35 feet." The revision neither makes sense nor addresses NMED's Second Disapproval Comment 8. NMED's Second Disapproval Comment 8 states, "[t]he RDX concentrations exceeding the soil leachate-based screening level (SL-SSL) of 0.06 mg/kg were detected in multiple confirmation samples at the TNT leaching bed area; therefore, leaching potential of the contaminants still remains. The text is misleading without stating the fact that the concentrations of multiple contaminants remain above respective SL-SSLs at the TNT leaching bed area. Revise appropriate sections of the Report accordingly." Address this comment in the revised Report. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

**Army Response:** Concur. Section 2.4.2.2.7, page 2-14, lines 33-35 and Section 2.4.4.2.1, page 2-21, lines 27-29 have been revised to state to state the following: "Residual nitrate and explosives contamination are still present exceeding the soil leachate-based screening level (SL-SSL) of 0.06 mg/kg below an approximate depth of 35 feet".

#### **11. Permittee's Response to NMED's Second Disapproval Comment 10, dated July 25, 2022**

**Permittee Statement:** "The Army will prepare a work plan to remediate soils where perchlorate concentrations exceeded applicable SL-SSLs at the Building 528 Complex. Given the location of the perchlorate spills and the exposed bedrock in the area, the Army proposes to consider addressing the perchlorate contamination through in-situ treatment of the ground and underlying groundwater. The Army proposes a Pilot Study to determine if in-situ remedies are effective for perchlorate and other explosive compounds present at depth and in groundwater that are not amenable to removal action. The Pilot Study will support the upcoming Northern Area Groundwater Corrective Measures Study. The Army is pursuing a comprehensive approach to contracting for upcoming related requirements at FWDA that is requiring additional time to develop. The Army is therefore respectfully requesting to revise the proposed submittal date for the Pilot Study Work Plan to November 30, 2023."

**NMED Comment:** Clarify whether the extent of the contamination where perchlorate concentrations exceeded applicable SL-SSLs has been defined for the building 528 Complex in the revised Report. Determination of the extent of the contamination where the soils can physically be removed must be the first step of the remedial plan. If SL-SSL exceedances are found to be present at depths where physical soil removal is impracticable, in-situ treatment of the soil and underlying groundwater will be required, and a separate bench scale treatability study and/or field pilot study must be proposed as second step of the remediation plan. Incorporate this provision in the relevant work plan. The Second Disapproval Comment 10 directed the Permittee to submit a separate work plan to remediate soils where perchlorate concentrations exceeded the applicable SL-SSL no later than **July 30, 2023**. Since the Pilot Study Work Plan is not required at this time, the direction in Second Disapproval Comment 10 remains valid and the Permittee must submit the work plan no later than **July 30, 2023**.

**Army Response:** Concur. The extent of perchlorate contamination has not been fully defined for building 528 Complex. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Work Plan to complete the RFI process for Parcel 22, including the investigation of perchlorate in soils, by 15 March 2024. Based on the results of the Parcel 22 RFI, the Army will proceed with the other studies

noted in the comment above regarding perchlorate remediation.

**12. Permittee's Response to NMED's Second Disapproval Comment 13, dated July 25, 2022**

**Permittee Statement:** "The Army does not believe that collecting soil samples at these well locations would change the findings or recommendations regarding the extents of the groundwater contamination plumes. None of the wells in question were installed in contaminant source areas where elevated contaminant concentrations would be expected. The Army has not identified data gaps with respect to soil contamination in these areas."

**NMED Comment:** The site history is not complete, nor definitive, regarding the location and timing of all contaminant releases. For example, the Permittee's response to NMED's Second Disapproval Comment 9 states that "the Army believes that the bedrock nitrate contamination originated from releases to the exposed bedrock at the building 528 Complex." The Permittee adequately demonstrated that the bedrock nitrate contamination originated from releases to the exposed bedrock; however, such nitrate releases were not historically recorded at the building 528 Complex. In order to identify potential releases that were not historically recorded, it is imperative to collect soil samples from every boring for laboratory analysis, as directed in the NMED's January 22, 2020, Approval with Modifications Final Northern Area Background Well Installation and Completion Report. However, since this direction was provided after the wells were already installed, the Permittee is no longer required to submit a work plan for collection and analysis of soil samples. The Permittee may disregard the direction required by NMED's Second Disapproval Comment 13. However, the Permittee must acknowledge that there are still data gaps because soil samples were not collected at the time of well installation. The Permittee is required to collect soil samples from all future well installations unless NMED provides specific direction otherwise. No revision is required to the Report.

**Army Response:** Comment Noted and Concur. The Army will collect soil samples at regular intervals for additional wells installed.

**13. Permittee's Response to NMED's Second Disapproval Comment 17, dated July 25, 2022**

**Permittee Statement:** "The Army is therefore respectfully requesting to revise the proposed submittal date for the work plan to November 30, 2023. building B005 is vacant and is not suitable for occupancy. In the future the Army intends to demolish this building."

**NMED Comment:** Since the Permittee intends to demolish the building B005 in the future, potential risks to future occupants will be eliminated by demolition of the building; therefore, the work plan to investigate vapor intrusion risk at the building B005 is not necessary at this time. State that the building will never be occupied and will be demolished in the revised Report.

**Army Response:** Concur. A statement was added to Section 5.2.1, page 5-3, line 15, noting that building B005 is not occupied and will be demolished.

**14. Permittee's Response to NMED's Second Disapproval Comment 20, dated July 25, 2022**

**Permittee Statement:** "Collection and analysis of soil samples for hexavalent chromium was not identified at the locations of the wells installed as part of the Northern Area Groundwater RFI, as there are no contaminating activities identified that would result in the presence of hexavalent chromium. The relatively low concentration of trivalent chromium as compared to the screening levels is suggestive of the low potential presence of hexavalent chromium. Analysis of hexavalent chromium would not change the findings or recommendations regarding the extents of the groundwater contamination for the Northern Area Groundwater RFI."

**NMED Comment:** The Permittee's explanation for why hexavalent chromium analysis was not performed is inadequate. Hexavalent chromium can be associated with open burning of military propellants, live firing, explosives wash-out wastewater facilities, the TNT leaching beds and production, thermal treatment of small arms munitions, and open burning/open detonation of explosives. All of those activities are relevant to the presence of hexavalent chromium and are activities that occurred in the Study Area; therefore, hexavalent chromium contamination may potentially be identified. NMED's Second Disapproval Comment 20 states, "submit a work plan to advance a soil boring to collect a soil sample at the nearest accessible location from well TMW57 for hexavalent chromium analysis no later than **July 30, 2023**" and this comment remains valid. Submit the required work plan no later than **July 30, 2023**. Failure to follow NMED direction constitutes noncompliance and may result in an enforcement action.

**Army Response:** Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Plan by March 15, 2024.

**15. Permittee's Response to NMED's Second Disapproval Comment 22, dated July 25, 2022**

**Permittee Statement:** "The requested analysis will be performed as part of the periodic groundwater monitoring program and reported therein."

**NMED Comment:** Identify which periodic groundwater monitoring report will present the results of the nitrite analyses for wells MW27, MW35, and TMW59 conducted by two independent analytical laboratories in the response letter.

**Army Response:** Concur. Results will be presented in the January-June 2023 Periodic Monitoring Report.

**16. Permittee's Response to NMED's Second Disapproval Comment 23, dated July 25, 2022**

**Permittee Statement:** "The Army believes it has sufficiently determined the extent of RDX in the alluvial aquifer to proceed with remedy evaluation and selection."

and,

"The Army requests that consideration of additional wells be deferred until that time to better address the long-term goals of site remediation."



**NMED Comment:** The Permittee's statement was not responsive to NMED's Second Disapproval Comment 23, which states, "the distances from well TMW62 to wells TMW21 and MW27 exceeds 500 feet; therefore, the RDX plume boundary west of well TMW62 is not well defined. Submit a work plan to install an additional well to delineate the western boundary of the RDX plume no later than **February 20, 2023.**" The distances from well TMW62 to wells TMW21 and MW27 exceed 500 feet; the plume cannot be adequately defined between the wells. The extent of the RDX plume must be adequately delineated before proceeding with remedy evaluation and selection; failure to properly delineate the plume will likely result in inadequate remedial actions. The required date for submittal of the work plan of February 20, 2023, has already passed; therefore, the Permittee is out of compliance and may be subject to an enforcement action. The Permittee must submit the work plan as required.

**Army Response:** Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Plan by March 15, 2024.

**17. Permittee's Response to NMED's Second Disapproval Comment 24, dated July 25, 2022**

**Permittee Statement:** "TMW54 is appropriately constructed in the alluvial sediments and is monitoring groundwater conditions representative of this location. TMW54 was installed correctly to assess groundwater in the alluvial aquifer and is screened from the top of bedrock and through the alluvium. The shallow screen interval is due to the shallow thickness of the alluvial sediments at this location. A deeper screened well will be representative of bedrock conditions. There are several adjacent wells from which groundwater samples are collected and additional alluvial groundwater monitoring wells will not provide incremental benefit to delineation of any of the groundwater contaminant plumes at this location. The Army believes that the current alluvial groundwater monitoring network in this area is sufficient for groundwater contaminant plume monitoring purposes."

**NMED Comment:** Table 4-2.1(Monitoring Well Construction Details) indicates that the screened interval of well TMW54 was set from 21 to 41 feet below ground surface (bgs). The neighboring alluvial wells that produce water are consistently screened deeper. For example, well TMW57 located approximately 500 feet southwest of well TMW54 was screened from 60 to 70 feet bgs. Well TMW13 located approximately 500 feet west of well TMW54 was screened from 61 to 71 feet bgs. Well TMW41 located approximately 500 feet east of well TMW54 was screened from 56 to 66 feet bgs. Well TMW31S located approximately 500 feet south east of well TMW54 was screened from 50 to 60 feet bgs. Well TMW40S located approximately 500 feet north of well TMW54 was screened from 50 to 60 feet bgs. The boring log for well TMW54 included in Appendix E also indicates that the soils collected from the screened interval of well TMW54 were dry except when water was added for drilling and bedrock conditions (i.e., sandstone) at the location were not encountered to the termination depth of 90 feet bgs. Most importantly, well TMW54 was installed directly south of the Pre-1962 Leaching Bed and the groundwater data collected from well TMW54 will be useful to assess groundwater contamination associated with the Leaching Bed. NMED's Second Disapproval Comment 24 states, "submit a work plan to augment well TMW54 with an adjacent well that is constructed with a more appropriate screened interval or at an alternative nearby location no later than **February 20, 2023.**" The required date for submittal of the work plan of February 20, 2023, has already passed; therefore, the Permittee is out of

compliance and may be subject to an enforcement action. The Permittee must submit the work plan as required.

**Army Response:** Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Pan by March 15, 2024.

**18. Permittee's Response to NMED's Second Disapproval Comment 25, dated July 25, 2022**

**Permittee Statement:** "The Army will propose to investigate the extent of the soil vapor plume, including the potential for vapor intrusion, in the vicinity of Building B006, as [a] work plan to further investigate data gaps in the Administration Area. The Army is pursuing a comprehensive approach to contracting for upcoming related requirements at FWDA that is requiring additional time to develop. The Army is therefore respectfully requesting to revise the proposed submittal date for the work plan to November 30, 2023."

**NMED Comment:** The work plan is required to be submitted by **July 30, 2023**. Submit a separate letter work plan for this investigation no later than **July 30, 2023**. Extension requests are not appropriate in a Disapproval response. If an extension is required and the Permittee can show good cause, the extension request must be submitted in a separate letter and in accordance with Permit Section I.M.

**Army Response:** As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Pan by March 15, 2024, to address this requirement.

**19. Permittee's Response to NMED's Second Disapproval Comment 27, dated July 25, 2022**

**Permittee Statement:** "The Army is pursuing a comprehensive approach to contracting for upcoming related requirements at FWDA that is requiring additional time to develop. The Army is therefore respectfully requesting to revise the proposed submittal date for the work plan to November 30, 2023."

**NMED Comment:** The work plan to assess the locations and integrity of the sewer lines is required to be submitted by **July 30, 2023**. Submit a separate letter work plan for this investigation no later than **July 30, 2023**. Extension requests are not appropriate in a Disapproval response. If an extension is required and the Permittee can show good cause, the extension request must be submitted in a separate letter and in accordance with Permit Section I.M.

**Army Response:** Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Phase 2 Groundwater RFI Work Pan by March 15, 2024, to address this requirement.

If you have questions or require further information, please contact me at [George.h.cushman.civ@army.mil](mailto: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

cc:

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