



BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1

Santa Fe, New Mexico 87505-6303

Phone (505) 476-6000 Fax (505) 476-6030

www.nmenv.state.nm.us



RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 30, 2008

Mark Patterson
Ravenna Army Ammunition Plan
Building 1037
8451 State Route 5
Ravenna, OH 44266

Steve Smith
CESWF-PER-DD
819 Taylor Street, Room 3A12
PO Box 17300
Fort Worth, TX 76102-0300

**RE: NOTICE OF DISAPPROVAL
RCRA FACILITY INVESTIGATION WORK PLAN, PARCELS 12, 14 AND 25
FORT WINGATE DEPOT ACTIVITY
EPA ID# NM6213820974
FWDA-08-003**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has completed its review of the Department of the Army's (the Permittee) *RCRA Facility Investigation Work Plan, Parcels 12, 14, and 25* (Work Plan), dated February 28, 2008. NMED has determined that the Work Plan is technically deficient and is therefore issuing this Notice of Disapproval (NOD). The deficiencies of the Work Plan are outlined below.

Comment 1

In Section 3.0 (AOC 93 – Bivouac and Tank Training Area) the Permittee states that a number of trenches are located in Area of Concern (AOC) 93. The Permittee does not include dimensions for these trenches. The Permittee must revise Section 3.0 to include these dimensions.

Comment 2

In the Executive Summary ES.2 (Proposed Investigations), Section 2.3.3 (Planned Investigations) and Section 3.4 (Scope of Activities), the Permittee proposes to use multi-increment (MI) sampling for characterization purposes at AOC 93. The Permittee must collect discrete samples to characterize the concentration and extent of contamination at the site, at the proposed depth intervals (e.g., from the surface and from one foot below ground surface (bgs)).

Comment 3

In Section 3.4 (Scope of Activities), the Permittee proposes to collect MI samples for characterization at Parcel 12. Because MI sampling was developed for sites with suspected explosives-related contamination, the Permittee must propose collection of discrete samples from the Parcel 12 borrow pit, trenches, and ground scars at a frequency based on the unit size. The Permittee must also propose to collect confirmation samples after the demolition debris has been removed from the disposal trenches to determine if residual contamination is present.

Comment 4

In Section 3.4 (Scope of Activities) the Permittee summarizes the scope of characterization activities for AOC 93. The Permittee does not propose to collect and analyze any soil samples from Parcel 25. The Permittee must propose to collect soil samples from Parcel 25 where the former asphalt plant was located, from the area where there may have been coal storage, and in the vicinity of the vertical tank located on the north side of I-40. The Permittee must remove any visible asphalt or coal present on the northeast corner of Parcel 25.

Comment 5

In the Executive Summary ES.2 (Proposed Investigations) and in Section 3.5 (Analytical Program), the Permittee proposes to analyze soil samples for Target Compound List (TCL) semi-volatile organic compounds (SVOCs), TCL volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), metals, and asbestos. The site was used as a bivouac and tank training area where refueling was conducted. All the discrete samples collected from AOC 93 must also be analyzed for diesel range organic (DRO) compounds due to the possibility of fuel spills.

Comment 6

In Section 2.3.1 (Previous Investigations), the Permittee states that “[f]or locations where munitions and/or munitions components were possibly handled, a handheld magnetometer (Schonstedt MAC-51Bx) was used to augment the visual reconnaissance.” It is unclear where munitions were handled on Parcels 12, 14 and 25. The Permittee must explain in detail where the survey was performed and submit to NMED a map of the survey location(s).

Comment 7

In Figure 3-1 of the work plan, the Permittee identifies a fiberglass tank in Parcel 12 located southeast of Navajo Boulevard (Blvd). The Permittee does not specify what the tank was used for, or if the tank is still in use. The Permittee must explain the current status of the tank, and provide historical information related to the tank.

Comment 8

The Permittee in Section 3.2.2 (Historical Records Review) states that “[b]ecause the document (ANL, 1990; copy included at the end of Section 3.0) cited by NMED in their basis for listing the training area as an AOC references the two previous reports as the source for information on the training activities, it is assumed that the statement ‘some firing of weapons took place during this activity’ is erroneous.”

The two reports (USATHAMA, 1980 and Inland Pacific, 1982) referenced in the Argonne National Laboratory (ANL) 1990 document state that firing activities did not occur at AOC 93. The 1990 ANL document states that firing activities did in fact occur. Because the 1990 ANL document is the most recent of the three historic documents referenced, NMED considers the information provided in the 1990 ANL document to be the most current information regarding activities at AOC 93. The Permittee must provide further documentation that supports the statement that no firing activities occurred at AOC 93, or proceed using the 1990 ANL document as the basis for historical firing activities.

Comment 9

The text on the map C-8-51 provided by the Permittee in Section 3 under Historic Information is not legible. The Permittee must provide a legible map with a larger scale.

Comment 10

Based on the information provided by the Permittee in the Work Plan, NMED does not require any further characterization at Parcel 14. Although NMED believes that Parcel 14 meets all the requirements for property transfer, AOC 93 does not qualify for a corrective action complete determination until Parcel 12 and Parcel 25 are fully characterized and/or remediated (if necessary).

Comment 11

The Permittee has submitted Historical Aerial Photographs as Appendix C in the Work Plan. The Permittee did not include any explanation in Work Plan Section 3.2.1 (Historical Aerial Photographs) regarding the structures, materials, and other features identified on these aerial photographs. The following must be addressed:

1. In the 1935 aerial photograph, the Permittee identifies Silos, a tall structure, and light-toned material/liquid. The Permittee must explain the use of the Silos, describe the light-toned material/liquid, and identify the tall structure, its use, and current status.
2. In the 1948 aerial photograph, the Permittee identifies a dark-toned material and light-toned material on Parcel 25. The Permittee must explain these materials.
3. In the 1978 Aerial Photograph the Permittee identifies mounded material and probable coal to be present on Parcel 25. The Permittee must provide an explanation for these features.
4. In the 1978 and 1997 aerial photographs, the Permittee identifies a Vertical Tank located on Parcel 25 (in the northeast corner of AOC 93). The Permittee must provide details for the contents of the tank, and the historic and current uses of the tank.
5. In the 1985 aerial photograph the Permittee identifies a stain in the northeast corner of Parcel 25. The Permittee must provide information about the stain.
6. In the 1991 aerial photograph, the Permittee identifies a light-toned material on Parcel 14. The Permittee must provide information about the light-toned material.

The Permittee must address all comments contained in this NOD and submit a revised Work Plan. The cover page must indicate that the submittal is a revision and was prepared for NMED. The revised plan must be accompanied by a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. The Permittee must also submit an electronic copy that includes all edits and modifications shown in redline-strikeout. The revised plan must be submitted to NMED no later than June 27, 2008.

Messrs. Patterson and Smith
May 30, 2008
Page 5

If you have any questions regarding this letter, please contact Tammy Diaz of my staff at (505) 476-6056.

Sincerely,



James Bearzi
Chief
Hazardous Waste Bureau

cc: Tammy Diaz, NMED HWB
Dave Cobrain, NMED HWB
Cheryl Frischkorn, NMED HWB
Laurie King, U.S EPA Region 6
Chuck Hendrickson, U.S. EPA Region 6
Sharlene Begay-Platero, Navajo Nation
Eugenia Quintana, Navajo Nation
Steve Beran, Zuni Pueblo
Edward Wemytewa, Zuni Pueblo
Philana Booqua, Zuni Pueblo
Clayton Seoutewa, Southwest Region BIA
Link Lacewell, DOI/BLM
Rose Duwyenie, Navajo BIA

File: FWDA 2008 & Reading File
FWDA-08-003

