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September 30, 2022

Base Realignment and Closure Operations Branch

Mr. Rick Shean
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 Revision 2 Interim Measures Completion Report Parcel 21, Solid Waste Management Unit 1 – TNT Leaching Beds, Fort Wingate Depot Activity, McKinley County, NM, HWB-FWDA-19-006

Dear Mr. Shean:

This letter provides responses to the comments issued in the Approval with Modifications Letter, dated June 6, 2022, from the New Mexico Environment Department (NMED). In addition to the comment response provided in this letter, also included are an electronic version of the revised report (1 CD) and replacement pages for your review and consideration.

Permittee's Response to NMED's Approval with Modifications Comment 1, dated April 4, 2022

Permittee Statement: "A column identifying SL-SSLs has been added to Tables 5-24 and 5-25, and exceedances are identified by shading. In addition, Figure 4-1 has been revised to indicate that Area 1 and Area 2 decision units (all) exhibit exceedances of [soil leachate-based soil screening levels (SL-SSLs)]. Tables 5-24 (Figures pages 210- 212) and 5-25 (Figures pages 213 - 214) have been replaced with the updated tables (same page numbers). In addition, Figure 4-1 (Figures page 11) has been replaced with the updated Figure 4-1.

NMED Comment: Several issues were identified in Tables 5-24 and 5-25 and Figure 4-1. Address the following issues:

- a) The RDX concentrations in the soil samples collected from Soil Stockpile Area 1 and 2 range from 2.12 to 6.05 mg/kg, and from 1.59 to 3.77 J mg/kg, respectively, according to Tables 5-24 and 5-25. The RDX concentrations in all soil samples collected from Soil Stockpile Area 1 and 2 remain significantly above SL-SSL of 0.06 mg/kg. Since the groundwater beneath SWMU 1 is already contaminated with RDX, installation of a geotextile membrane will not provide additional groundwater protection. However, RDX contamination may spread from the area via wind or surface water runoff because contaminated soils remain. Propose to submit a work plan to remediate the soils that contain RDX concentrations above SL-SSL or propose to provide a preventative measure to contain the contaminated soils from spreading over the site (e.g., berm, cover) in a response letter, as appropriate. Otherwise, explain why remediation or preventative measures are unnecessary in a response letter.

Army Response: Following completion of the interim measure project at the TNT Leaching Beds, the soil stockpile areas referenced above were re-vegetated to address concerns for spread via wind or surface water runoff. In terms of the potential for contaminant leaching from the soil stockpile areas to the saturated zone, the Army believes the potential is minimal because of the very low regional infiltration rates and the approximately 35-foot depth to groundwater. Nevertheless, the 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.

- b) **NMED Comment:** Tables 5-24 and 5-25 do not identify non-detection (ND) values that exceed SL-SSLs as data quality exceptions. For example, the nitroglycerin concentration in the soil sample designated as 2101B-AC02-0002-I-SO-C is reported as 0.1 U mg/kg, which is ten times greater than the SL-SSL of 0.01 mg/kg. The ND exceedance is not identified in the tables or discussed in the Report. ND results with reporting limit (RL) values exceeding their respective screening levels must be considered as a data quality exception and must be identified as such in all applicable sections, tables, and figures of the Report. Revise the Report accordingly and provide replacement pages.

Army Response: The approved Interim Measures Work Plan identifies the nitroglycerin screening level as the residential SSL of 6.16 mg/kg. The IMWP only references SL-SSLs for contaminants of concern (i.e., TNT, RDX, nitrate). Soil contaminant concentrations were compared with residential SSLs per the NMED-approved IMWP. When analytical data are compared to residential SSLs, there are no data quality exceptions. However, those analytes with LODs greater than SL-SSLs have been highlighted in Tables 5-24 and 5-25. Text has been added to Section 5.8 noting that analytes were not detected in pre- or post-use sample results.

- c) **NMED Comment:** A footnote of Tables 5-24 and 5-25 states, "qualifier U - the compound was analyzed but not detected." It is not clear whether the compound was not detected above reporting limits (RLs), or method detection limits (MDL). All laboratory results that are presented as "not detected (e.g., 0.1 U)" must reference the RL rather than MDL values. Note that MDL applies to the specific laboratory instrument and not to individual samples. Use of the MDL to indicate a value for ND data is not accurate and is a misrepresentation of the data. The Permittee must use the RL rather than MDL value to report undetected analyte concentrations. Revise the tables and provide replacement tables, as applicable.

Army Response: Concur. The Limit of Quantitation was used as the Reporting Limit for reporting non-detections. Since this is consistent with NMED's direction above, no changes were necessary as a result of this comment.

- d) **NMED Comment:** Figure 4-1 (Pre-Excavation Activities) does not present exceedances of SL-SSLs in Area 1 and Area 2, although each decision unit is identified. Figure 4-1 presents pre-excavation activities and Tables 5-24 and 5-25 present data collected after the soil stockpiling activities were completed. Therefore, presenting the data collected from a different timeline in Figure 4-1 is not appropriate. Provide a separate figure depicting the locations of the exceedances identified in Tables 5-24 and 5-25. Provide appropriate replacement pages.

Army Response: Concur. Figure 5-18 has been added, which identifies Areas 1 and 2 decision units with post-use analyte concentrations that exceed SL-SSLs.

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
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Enclosures

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