



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

February 16, 2024

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: Third Extension Request, Parcel 3 Inner Fence Report, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974

Dear Mr. Maestas:

The purpose of this letter is to request a third extension for the submittal of the Parcel 3 Inner Fence Report to the New Mexico Environment Department (NMED) from February 22, 2024, until July 15, 2024, due to delays with laboratory results and analyses. As you are aware, the submittal date for the Inner Fence Report was most recently established in NMED's February 11, 2022, Approval with Modifications for the Final Work Plan Inner Fence, Parcel 3 Revision 4.0. Since that time, there have been several correspondences between NMED and the Army, most recently with the NMED extension approval dated February 6, 2024.

The Army completed the manual munitions and explosives of concern (MEC) removal work in the Inner Fence area, and followed with surface soil sampling fieldwork in June of 2023, in accordance with the approved Final Work Plan Revision 4.0. The laboratory was provided the samples in June of 2023. The quantity of soil samples collected for analysis was substantial and, coupled with other internal requirements, caused delays in the submission of analytical results from the laboratory. The extent of the laboratory's difficulties was unknown to us as we had received some results in mid-September. The laboratory did not notify our contractor (AECOM) until mid-November of the extent of their problems with providing the required sample results. The analytical data has now been received and is undergoing data validation, to be followed by final analysis and development of conclusions.

At this time, the Army is seeking an extension in time under RCRA Permit Section I.M. to complete the data validations and analysis and incorporate the results into the Final Inner Fence Report. The follow-on Army review of the draft document and any subsequent revisions will require some additional time before we have a completed final report that is appropriate to send to NMED. Once it became clear that the soil sampling results would delay the submittal of the Inner Fence Report, we considered sending a partial report that only discussed the MEC removal portion of the work since that work is complete. However, we thought that might make a review of the document more difficult. Please let us know if NMED would prefer such a phased submittal of the Inner Fence Report. In the interim, and as a result of the extensive laboratory delays thus far, the Army will update your department on a monthly basis on the status of the data validation effort and report. We appreciate NMED's patience and understanding as we work to finalize this report.

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) 703-608-2245 (Mobile) or [Cheryl.a.frischkorn.civ@army.mil](mailto:Cheryl.a.frischkorn.civ@army.mil), 703-624-6249.

Sincerely,

*George H. Cushman IV*

George H. Cushman IV  
BRAC Environmental Coordinator  
Fort Wingate Depot Activity  
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Enclosures

CF:

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