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Certified Mail - Return Receipt Requested

April 3, 2023

George H. Cushman
Headquarters, Department of the Army
Office of the DCS, G-9
Army Environmental Office, Room 5C140
600 Army Pentagon
Washington, DC 20310-0600

**RE: APPROVAL WITH MODIFICATIONS
FINAL HAZARDOUS WASTE MANAGEMENT UNIT PROGRESS STATUS REPORT, 2021
PARCEL 3
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-22-003**

Dear Mr. Cushman:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Hazardous Waste Management Unit Progress Status Report, 2021 HWMU, Parcel 3* (Report), dated June 22, 2022. NMED has reviewed the Report and hereby issues this Approval with Modifications with the following comments.

COMMENTS

1. Section 3.1, Soil Sampling Results, lines 21-22, page 3-1

Permittee Statement: "In October 2021, the Army began analyzing NMDA [sic] separately using Method 8270D-SIM to achieve a lower detection limit."

NMED Comment: Table 3-2 (Laboratory Limits Greater Than SSLs) indicates that the limit of quantitation (LOQ) for NDMA is 0.023 mg/kg, which is lower than the respective soil screening level of 0.0234 mg/kg. However, both Appendix A.1, Stockpile Soil Sampling Results, and A.2, Confirmation Soil Sampling Results, indicate that the LOQ values for NDMA were 0.026 mg/kg, which slightly exceeds the soil screening level for NDMA. Although the improvement to lower LOQ is notable, the LOQ values for NDMA continue to exceed the NMED soil screening level. Correct the table and provide additional discussion in the 2022 HWMU Progress Status Report.

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
Telephone (505) 476-6000 - www.env.nm.gov

2. Section 3.1.1, Stockpile Soil Sampling Results, lines 9-10, page 3-3

Permittee Statement: "Lead was detected above the residential SSL noncancer endpoint of 400 mg/kg in one sample (Sample ID: P3HWMU-SKPL-2061) at a concentration of 2,940 mg/kg."

NMED Comment: The lead concentration in the stockpile soil sample collected from Stockpile number 2061 was significantly higher than that of all other stockpile soil samples. Section 3.1.2 (Excavation Bottom/Sidewall Confirmation Soil Sampling Results), lines 20-22, page 3-3 states, "[o]f the 30 confirmation soil samples collected and analyzed for VOCs, SVOCs, explosives, polychlorinated biphenyls, dioxins/furans, metals, cyanide, nitrate, and perchlorate, there were no laboratory detections that exceeded the residential cancer or noncancer screening levels." Although residual lead contamination does not remain in the grid(s) according to Section 3.1.2, it is imperative to correlate the stockpile numbers to the location of the sample grids shown on Figure 2-1. If the lead exceedance was identified in the soils collected from the grids adjacent to the HWMU boundary (e.g., grids H14 through H20), the contamination may potentially extend past the HWMU boundary, even though the confirmation sampling results within the grids indicated that the lead exceedance was eliminated. Provide a table that presents the correlation between the stockpile numbers and the location of the sample grids in the 2022 HWMU Progress Status Report. If the stockpile soil exceedances correlate with the grids located at the HWMU boundary, additional investigation and/or remedial actions must be proposed for potentially contaminated soils outside of the HWMU boundary. Include this provision and provide additional discussion in the 2022 HWMU Progress Status Report.

3. Section 4, Summary, line 25, page 4-1

Permittee Statement: "No transport and disposal of contaminated stockpile soil was conducted in 2021."

NMED Comment: Appendix E (Erosion Control Photographs) includes photographs of the dust control measures conducted by spraying water over the stockpiles. The photographs indicate that the soils were not covered by any physical barriers. The average wind speed can exceed 15 miles per hour in McKinley County. The contaminated soils kept more than two years at the stockpile area may have dispersed to surrounding areas. In addition, straw wattles were placed around the perimeter of the stockpiles based on the photographs; rainwater runoff may not be prevented by this method of erosion control during monsoon season. Provide a figure that depicts the location of the entire stockpile area and the area(s) where contaminated stockpiles are located in the 2022 HWMU Progress Status Report. Also, include a provision to investigate potential surface soil contamination surrounding the stockpile areas that may be caused by erosion and wind dispersion upon completion of the removal activities in the 2022 HWMU Progress Status Report.

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The Permittee must address all comments in this letter in the 2022 HWMU Progress Status Report. The Permittee must submit the 2022 HWMU Progress Status Report no later than **June 30, 2023**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 690-6930.

Sincerely,



Dave Cobrain
Program Manager
Hazardous Waste Bureau

cc: B. Wear, NMED HWB
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