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NEW MEXICO
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James C. Kenney
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Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

July 3, 2019

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

Steve Smith
USACE
CESWF-PER-DD
819 Taylor Street, Room 3B06
Fort Worth, TX 76102

**RE: RESPONSE TO REQUEST FOR WORK PLAN AND RISK GUIDANCE
DEVIATIONS – GROUNDWATER SUPPLEMENTAL RFI WORK PLAN
REVISION 4
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-15-001**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Request for Work Plan and Risk Guidance Deviations Groundwater Supplemental RFI Work Plan Revision 4*, dated June 13, 2019 and received June 19, 2019.

The Permittee requested four deviations from the NMED-approved *Final Groundwater Supplemental RFI Work Plan Revision 4* (Work Plan) and the NMED *Risk Assessment Guidance for Site Investigations and Remediation*.

1. **Permittee Request:** Replace Encore Soil Sampler with Terra Core Sampler (or 4 ounce jar as an exception)

NMED Comment: The Permittee may utilize Terra Core Samplers in place of Encore Soil Samplers, as they are considered equivalent. The Permittee may use jars only when attempts to use the Terra Core Samplers fail. When a jar is used, the Permittee must provide a

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discussion of the issues that prevented the sample from being collected using the Terra Core Samplers in the subsequent report. The discussion must include details of the sampling effort and the soil classification for each sample collected in a jar.

2. **Permittee Request:** Replace Hollow Stem Auger with Rotosonic for Alluvial Borings

NMED Comment: The Permittee may utilize Rotosonic drilling for advancement of soil borings into the alluvial aquifer. The Permittee must provide accurate soil characterization of the continuous core collected by the Rotosonic drilling method.

3. **Permittee Request:** Replace FROG 4000 Field Analyzer with HAPSITE GC/MS

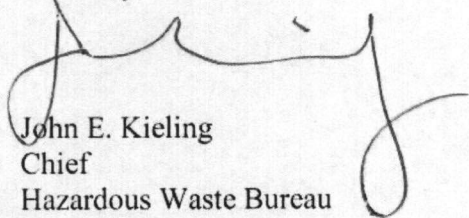
NMED Comment: The Permittee may utilize the HAPSITE GC/MS for soil gas screening purposes. The Permittee is reminded that data collected by field instruments may only be used for screening purposes unless a high correlation with duplicate analytical laboratory data is demonstrated. Field instrument screening data may not be used for confirmation or compliance purposes.

4. **Permittee Request:** Replace Upper Tolerance Limit with Upper Prediction Limit for Background Groundwater

NMED Comment: The Permittee may utilize the Upper Prediction Limit in lieu of the Upper Tolerance Limit.

Should you have any questions, please contact Ben Wear of my staff at (505) 476-6041.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, EPA Region 6 (6LCRRC)
L. Rodgers, Navajo Nation
S. Begay-Platero, Navajo Nation
M. Harrington, Pueblo of Zuni
C. Seoutewa, Southwest Region BIA
G. Padilla, Navajo BIA
J. Wilson, BIA
B. Howerton, BIA

Messrs. Patterson and Smith

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R. White, BIA

C. Esler, Sundance Consulting, Inc.

File: FWDA 2019 and Reading, Groundwater