



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



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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: APPROVAL WITH MODIFICATIONS
FINAL RCRA FACILITY INVESTIGATION PHASE 2 WORK PLAN
PARCEL 23 REVISION 1.0
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-18-004**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final RCRA Facility Investigation Phase 2 Work Plan Parcel 23 Revision 1.0* (Work Plan), dated April 29, 2019. NMED has reviewed the Work Plan and hereby issues this Approval with Modifications. The Permittee must address the following comments.

1. Permittee's Response to NMED's Disapproval Comment 6

Permittee Statement: "If target analytes are detected in blank samples, the contractor will U qualify detected results from the associated field samples, at the higher of the detected concentration or the limit of detection, if the concentration detected in the sample is less than five times the concentration detected in the blank."

NMED Comment: The proposed protocol is too general to be applied for every instance. If the detected concentration in blank samples are five time higher than that of field samples,

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collection of additional samples and associate QA/QC samples may be more appropriate to verify the occurrence of potential sample handling error (e.g., mislabeling). Provide criteria for collection of additional samples (e.g., frequency of detections, concentrations of constituents in blanks) to verify the occurrence of sampling errors. Revise the statement and provide a replacement page.

2. Permittee's Response to NMED's Disapproval Comment 15

Permittee Statement: "PAHs are the only COCs present in surficial soils that show low-level concentrations exceeding DAF 20 soil-to-groundwater SSLs over the length of the SWMU."

NMED Comment: According to Table 3-1, *Sample Locations and Analytes Exceeding 2019 Screening Levels – 1999 Sampling Effort*, and Table 3-2, *Sample Locations and Analytes Exceeding 2019 Screening Levels – 2000 Sampling Effort*, thallium and 2,4,6-trinitrotoluene concentrations exceeded the applicable screening levels. Therefore, metals and explosive compounds may be present on the surficial soils and are more mobile in water compared to PAHs. Nevertheless, the Permittee may use dilution attenuation factor (DAF) of 20 as default soil screening levels for the Phase 2 Investigation. Once the investigation is complete, reevaluate the appropriateness of the use of a DAF of 20 for the screening level.

3. Permittee's Response to NMED's Disapproval Comment 18

Permittee Statement: "The text (bullet item 2) was revised to strike the sentence: "SWMU 21 consists of two separate, non-contiguous areas that may be evaluated separately." Reference to non-contiguous areas in other sections was also removed, including section 5.1.5, 5.2.4, and Figure 5-1."

NMED Comment: Although the Permittee acknowledges that SWMU 21 is contiguous, the figures showing the SWMU boundaries (e.g., Figure 3-1) presents two separate boundaries. Revise all relevant figures and provide replacement figures.

The Permittee must address all comments in this Approval with Modifications and submit a response letter with revised figures and replacement pages as well as an electronic redline-strikeout version of the revised Work Plan showing all changes that have been made to the Work Plan no later than **September 16, 2019**. The Permittee must also include an electronic version of the final revised Work Plan with the response letter.

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.

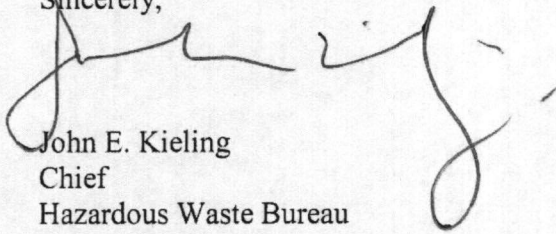
Messrs. Patterson and Smith

July 3, 2019

Page 3

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John E. Kieling
Chief
Hazardous Waste Bureau

- cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, U.S. EPA Region 6
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
R. White, BIA
C. Esler, Sundance Consulting, Inc.

File: FWDA 2018 and Reading, Parcel 23