



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030

www.env.nm.gov

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

November 7, 2019

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

**RE: DISAPPROVAL
FINAL WORK PLAN INNER FENCE REVISION 2.0, PARCEL 3
[SECOND] RESPONSE TO APPROVAL WITH MODIFICATIONS
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-17-001**

Dear Mr. Patterson

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Work Plan Inner Fence Revision 2.0, Parcel 3, [Second] Response to Approval with Modifications* (Response), dated October 15, 2019. NMED has reviewed the Response. The Permittee must address the following comments.

- 1. Permittee's Responses to NMED's Comment 2, dated September 18, 2018 and Comments 2 and 3, dated July 15, 2019**

Permittee Statement: "Please see replacement pages 3-14 (Line 24) through 3-23 (Line 7), and associated Figure 3-4, for a revision to the plan that includes a demonstration that

there is minimal potential contamination associated with low density areas and individual MEC items.”

NMED Comment: The pertinent discussion is included in replacement pages 3-14 (Line 12) through 3-22 (Line 27) in the Work Plan. Ensure that references are accurate. No response required.

2. Section 3.7.10, Soil Sampling of Low-Density MEC Areas, line 23, page 3-14

Permittee Statement: “Discrete locations will be sampled for explosives.”

NMED Comment: Explain why Incremental Sampling Methodology (ISM) was not proposed for sampling of explosives at low-density MEC areas. ISM is likely a more appropriate sampling method at low-density MEC areas, if properly implemented. Comment 3 in NMED’s *Disapproval Final RCRA Facility Investigation Report Parcel 6 Revision 1.0*, dated June 4, 2019 states, “[t]he NMED does not accept the inappropriate use of the incremental sampling method. NMED will only accept multi-incremental or ISM samples for explosives and metals in large-area surface releases with detonation or airborne distribution as the contaminant release source.” Evaluate whether ISM is a more appropriate sampling method at low-density MEC areas and provide an explanation in a response letter. If ISM is found to be more appropriate, provide replacement pages for all pertinent sections.

3. Section 3.7.10.1, Soil Sampling Design, lines 36-38, page 3-14 and lines 3-7, page 3-15

Permittee Statement: “The inputs to the module assumed 8,000 potential sampling locations (i.e., the estimated number of MEC items potentially present) within the Inner Fence.”

NMED Comment: All input parameters and supporting data for the Visual Sample Plan (VSP) “Item Sampling” module must be provided in the response letter. If input values are assumed, provide justification for the assumptions.

4. Section 3.7.10.1, Soil Sampling Design, lines 3-7, page 3-15

Permittee Statement: “VSP output determined collecting 59 soil samples from the potential 8,000 sampling locations would yield the desired confidence level (i.e., 95 percent confident that 95 percent of the 8,000 sampling locations are below SSLs), assuming that all sample results were below screening levels and cancer risks are less than or equal to 1.0E-05 and hazard equal to or less than 1.0.”

NMED Comment: Demonstrate how 59 soil samples from 8,000 potential sampling locations (approximately 0.7 percent) will produce the desired confidence level. The

number of samples does not appear to be sufficient. In addition, if 8,000 sampling locations are identified during the clearance activities, explain how 59 sampling locations are selected out of the 8,000 potential locations. Furthermore, discuss the actions that will be taken in a scenario where the sampling results exceed the screening levels. Provide replacement pages that include the demonstration and discussion.

5. Section 3.7.10.1, Soil Sampling Design, lines 7-8, page 3-15

Permittee Statement: "Note, the number of MEC items (i.e., 8,000) present within the Inner Fence is estimated and subject to be refined as more information is obtained."

NMED Comment: The number of MEC items in low-density MEC areas is presumably estimated and refined from the MEC clearance activities conducted with the grid system presented in Figure 3-1, *Inner Fence Area Grid Map*. However, Figure 3-1 does not indicate which grids are considered as high or low density MEC areas. The Permittee must define what constitutes high and low density MEC areas in the revised Work Plan (e.g., the number of detected MEC items per grid). Provide replacement pages that include the explanation.

6. Section 3.7.10.2, Sampling Procedures, Soil Sample Analyses, lines 28-29, page 3-16

Permittee Statement: "Each discrete soil sample will be analyzed for explosives (Method 8330B) and submitted to Agricultural Priority Pollutants Laboratory, Inc. for chemical analysis."

NMED Comment: In Section 3.12.5, *Confirmation Soil Sampling [of high-density MEC areas ("HWMU-like" areas)]*, lines 19-20, page 3-33, the Permittee states, "[e]ach excavation or grid will be sampled for the constituents listed in Section III.A.4 of the FWDA RCRA Permit." Section III.A.4 of the FWDA RCRA Permit requires chemical analysis of volatile organic compounds, semi-volatile organic compounds, metals, explosive compounds, perchlorate, nitrate, cyanide, PCBs, dioxins, furans, and any other hazardous constituents specified by NMED. The analytical suite for soil sampling of low-density MEC areas must be comparable to that of high-density MEC areas except an analysis for volatile organic compounds (VOCs). VOCs are unlikely to be present as a result of the activities associated with low-density MEC areas; therefore, VOC analysis is not required at low-density MEC areas. However, the Permittee must propose to collect samples for semi-volatile organic compounds, metals, explosive compounds, perchlorate, nitrate, cyanide, PCBs, dioxins, and furans or provide justification for a reduced analytical suite. Revise all pertinent sections of the Work Plan (e.g., Section 3.7.10.2) to include the provision and provide replacement pages.

7. Section 3.7.10.2, Sampling Procedures, Soil Sample Collection, lines 1-2, page 3-17

Permittee Statement: "Using a decontaminated spoon or trowel (or disposable tool), remove soil from a one square foot area at the discrete soil sample location until the sampling depth of 0.5 ft is reached.

NMED Comment: In Section 3.7.10.1, lines 16-19, page 3-15, the Permittee states, "[s]oil samples will be collected from the 6-inch interval directly below a MEC where the highest likelihood of residual contamination would be found (e.g., for a MEC items recovered at 6 inches below ground surface, the soil sample would be collected from 6-12 inches below ground surface)." The Permittee's statement regarding the sampling procedures does not follow the procedure described in Section 3.7.10.1. Revise the Work Plan for accuracy and provide replacement pages.

The Permittee must address all comments in this letter and submit a response letter with replacement pages no later than **February 28, 2020**. In addition, the Permittee must submit an electronic version of the revised Work Plan, as well as an electronic redline-strikeout version of the revised Work Plan showing all changes that have been made to the Work Plan. Two copies of all submittals must be provided.

Mr. Patterson
November 7, 2019
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Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



Dave Cobrain
Program Manager
Hazardous Waste Bureau

cc: B. Wear, NMED HWB
M. Suzuki, NMED HWB
S. Smith, Army Corp of Engineers
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
R. Duwyenie, Navajo BIA
J. Wilson, BIA
B. Howerton, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.

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