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ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 21, 2017

Mark Patterson
FWDA, BRAC Coordinator
P.O. Box 93
Ravenna, OH 44266

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

**RE: DISAPPROVAL
PERMITTEE-INITIATED INTERIM MEASURES REPORT PARCEL 6
AREA OF CONCERN 28, SWMU 8 – FORMER BUILDING 537, SWMU 20 –
FEATURE 4 (AREAS A AND B), AND LOCOMOTIVE
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-16-011**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity's (Permittee) *Permittee-Initiated Interim Measure Report, Parcel 6, Area of Concern 28, SWMU 8 – Former Building 537, SWMU 20 – Feature 4 (Areas A and B), and Locomotive* (Report), dated October 26, 2016. NMED has reviewed the Report and hereby issues this Disapproval. The Permittee must address the following comments.

1. Section 4.6, Waste Profile and Disposal, lines 17-18 and 21-22, page 4-2

Permittee Statements: "The sample was also analyzed for lead using TCLP."
"Waste characterization results and disposal documentation is included as Appendix D."

NMED Comment: The result of TCLP analysis for lead was not included in Appendix D. Provide the laboratory analytical results and documentation to show the waste was

characterized as nonhazardous in the revised Report.

2. Section 5-3, Waste Profile Sampling and Disposal, lines 4-6, page 5-2, and Section 5.7, Waste Volume Determination, lines 36-38, page 5-10

Permittee Statements: "Waste profile sampling of the impacted soil of SWMU 8 - Former Building 537 included collection of two samples from the stockpiled excavated soil to meet the landfill requirement of one profile sample for each 100 cubic yards of waste."

"Based on the comparison of the site elevation surveys, plus the additional material excavated, the volume of waste material removed from SWMU 8 - Former Building 537 was 429 cubic yards."

NMED Comment: Four samples were required to meet the landfill requirement although only two samples were collected for waste characterization. Provide an explanation for this discrepancy. In addition, the waste manifests in Appendix G indicate only 306 cubic yards of soil were transported to the landfill. Account for the remaining 123 cubic yards of excavated soil in the revised Report.

3. Section 5.4, Confirmation Sampling, lines 22-34, page 5-2

Permittee Statement: "One discrete sample was collected from each excavation area bottom in Areas A, B, and F. Two discrete samples were collected from the excavation area bottom in Areas C and E. Five discrete samples were collected from the excavation area bottom in Area D. All excavation area bottom samples were analyzed for PCBs using USEPA Method 8082A. The excavation area bottom sample collected from Area F was also analyzed for PAHs using USEPA Method 8270 SIM and SVOCs using USEPA Method 8270D. One discrete sample was collected from the sidewalls of each excavated area every 50 feet along the entire perimeter or sidewall of each removal area. Four discrete sidewall samples were collected from Areas A, B, E, and F. Six discrete sidewall samples were collected from Area C. Eleven discrete sidewall samples were collected from Area D. All sidewall samples were analyzed for PCBs using USEPA Method 8082A. The sidewall sample collected from Area F was also analyzed for PAHs using USEPA Method 8270 SIM and SVOCs using USEPA Method 8270D."

NMED Comment: The samples collected from Areas A through E were analyzed for PCBs, but not for SVOCs. Analysis for SVOCs using EPA Method 8270D was directed by the *NMED Approval with Modifications* letter, dated May 29, 2015. Since the excavated areas have already been backfilled, the Permittee must collect sidewall samples from the native soil adjacent to the original sampling locations (one foot or less laterally from the backfill perimeter, and at the same depth where original sidewall samples were collected). Soil samples must also be collected from the same bottom sample locations; from native soil directly below the backfill. All of the samples must be analyzed for SVOCs using EPA Method 8270D. Include the analytical results and discussion in the revised Report. Revise the Report to reevaluate the risk and propose additional corrective action, as necessary. In addition, the Permittee was directed to collect sidewall samples in Areas A, B, E and F at ten

feet intervals, and in Areas C and D at fifteen feet intervals along the excavation perimeter according to the May 29, 2015 letter. It appears that the sidewall samples were collected every fifteen feet in Areas A and E and every twenty feet in Area D. The number of samples must be increased in Areas A, D, and E to meet the requirements specified in NMED's *Approval with Modifications* (May 29, 2015). Revise Figure 5-2 and 5-3 to include additional sidewall sampling locations. The additional sidewall samples must be collected at depths corresponding to the previous samples and must be analyzed for PCBs using EPA Method 8082A and SVOCs using EPA Method 8270D. Revise the Report to reevaluate the risk and propose additional corrective action, as necessary.

4. Section 5.6.1, Data Quality Objectives, lines 33-38, page 5-4, and Section 5.6.9, Uncertainty Discussion, line 28, page 5-10

Permittee Statements: "The comparison indicated that all laboratory reporting limits would be less than the cleanup levels, except for two analytes being analyzed using USEPA Method 8270D (benzidine and n-nitrosodimethylamine). Table 5-1 of this report demonstrates that the actual reporting limit achieved for each analyte was less than its corresponding cleanup level, except for benzidine and n-nitrosodimethylamine, as expected based on the comparison provided in the work plan."

"The Army proposes no further action relating to these compounds."

NMED Comment: NMED concurs that these compounds are not associated with any facility activity; thus, no further action relating to these compounds is necessary. However, the Permittee must use an analytical method capable of providing lower detection limits for these compounds in the future. No revision to the Report is necessary.

5. Section 6.4, Confirmation Sampling, lines 20-26, page 6-2, and Section 6.6.3, Data Used in the Evaluation & Identification of COPCs, lines 30-39, page 6-5 & lines 1-5, page 6-6

Permittee Statements: "Following the removal of surface debris from Feature 4, nine discrete excavation confirmation samples were collected from Area A and 13 discrete confirmation samples from Area B. Each sample was analyzed for RCRA 8 metals using USEPA Method 6010C and Method 7471B; PCBs using USEPA Method 8082A; PAHs using USEPA Method 8270 SIM; SVOCs using USEPA Method 8270D; VOCs using USEPA Method 8260C; pesticides using USEPA Method 8081B and asbestos using USEPA Method 600/R-93/166. A total of 22 discrete samples and five field duplicate sample were collected from Feature 4."

"Area A – The debris in this area occurred in mounds that were several feet thick in the center, tapering off to a few inches along the edges of the mounds. During the initial excavation, nine samples and three duplicates were collected from below the base of the excavation at depths up to 2.0 feet bgs (4AEC01-0.0-0.5D-SO through 4AEC09-0.0-0.5D-33 SO). During a subsequent excavation to address cleanup level exceedances in two locations (4AEC05-0.0-0.5D-SO and 4AEC08-0.0-0.5D-SO), two additional samples were collected below the base of the excavation at approximately 3.5 feet bgs and 3.0 feet bgs (4AEC05-1.0-1.5D-SO and 4AEC08-1.0-1.5D-SO).

Area B – The debris in this area was thickest to the north at just over a foot, tapering to less than 6 inches thick on the south. During the initial excavation, thirteen samples and two duplicates were collected from below the base of the excavation at depths up to 1.0 feet bgs (4BEC01-0.0-0.5D-SO through 4BEC013-0.0-0.5D-SO). During a subsequent excavation to address cleanup level exceedances at one location (4BEC03-0.0-0.5D-SO), one additional sample was collected below the base of the excavation at approximately 2.0 feet bgs (4BEC03-1.0-1.5D-SO).”

NMED Comment: The Permittee is required to collect discrete samples every 20 ft from the sidewalls of the excavation when debris is removed from depths greater than one foot bgs according to the May 29, 2015 letter. It appears that no sidewall samples were collected even though the excavation depth exceeded one foot bgs in several areas. The Permittee should have collected sidewall samples from areas where the excavation depths exceeded one foot bgs. Collect sidewall samples from the native soils at the limits of excavation and analyze them for all analytical parameters specified above. In addition, the Permittee is required to collect discrete samples at the base of the excavation using a 20-ft by 20-ft sampling grid according to the letter. The number of base samples collected by the Permittee appears to be less than the number of base samples required by the NMED (i.e., one sample per 400 ft²). Explain the variance in the revised Report; otherwise, additional base samples must be also collected and analyzed. Any additional base samples must be collected from native soils directly beneath the backfill. Include the analytical results and discussion in the revised Report. If the base of the excavation is sloped such that sidewall sampling is not possible, clarify the conditions in the revised Report. Provide photographs of the Area A excavation. Revise the Report to reevaluate the risk and propose additional corrective action, as necessary.

6. Section 6.6.1, Data Quality Objectives, lines 23-30, page 6-4

Permittee Statement: “The comparison indicated that all anticipated laboratory reporting limits would be less than the cleanup levels, except for two analytes being analyzed by USEPA Method 8270D (benzidine and n-nitrosodimethylamine) and two analytes being analyzed by USEPA Method 8260C (1,2,3-trichloropropane and 1,2-dibromo-3-chloropropane). The actual reporting limits achieved for each analyte tested were below the corresponding cleanup levels, except for the four analytes identified above, as expected based on the comparison provided in the work plan.”

NMED Comment: The Permittee must use an analytical method capable of providing lower detection limits for these compounds in the future. No revision to the Report is necessary. See Comment 4.

7. Section 6.6.8, Risk Evaluation Results, lines 1-2, page 6-10

Permittee Statements: “The results of the initial cumulative risk evaluation for all other COPCs indicate that the estimated cancer risk of 1×10^{-5} does not exceed the NMED target

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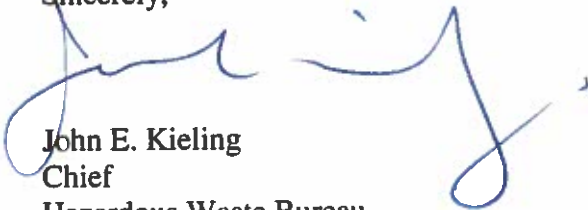
level of 1×10^{-5} .”

NMED Comment: Provide the estimated cancer risk with appropriate significant figures to show that the value does not exceed 1×10^{-5} .

The Permittee must submit a revised Report that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing all changes that have been made to the Report. The revised Report must be submitted no later than **March 31, 2018**.

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
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File: FWDA 2017 and Reading, Parcel 6, FWDA-16-011