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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 30, 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
FINAL WORKPLAN INNER FENCE, PARCEL 3
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA # NM6213820974
HWB-FWDA-17-001**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) received the Fort Wingate Depot Activity (Permittee) *Final Work Plan Inner Fence, Parcel 3* (Plan) on March 9, 2017. NMED has reviewed the Plan and hereby issues this Disapproval with the following comments:

GENERAL COMMENTS:

1. Work Plan Organization

NMED Comment: The Permittee has provided a document that is difficult to review. The organization of the document is inconsistent. For example, Table 2-1 and Figure 2-1 are located at the end of Section 2, whereas Table 4-1 is embedded in the text of Section 4 and all site maps are located in an appendix. For all tables, either locate the tables at the end of their section or, preferably, in a "Tables" section at end of report, but before the appendices. For all figures, which includes site maps, either locate the figures at end of their respective

sections or, preferably, in a “Figures” section at the end of the report, but before the appendices. The tables and figures located at the end of the sections either contain page numbers that are out of sequence with the rest of the section or do not contain page numbers at all. Include appropriate page numbering on all tables and figures.

Also, the Work Plan includes sections and appendices that are not needed or required. Inclusion of these sections and appendices requires NMED to review and provide comments on each of them, thereby significantly slowing the review process. Removal of these types of sections and appendices will allow NMED to provide more rapid review of documents. The extraneous sections and appendices include:

Section	Suggestion
Section 5: Explosives Management Plan	NMED does not review or approve explosive management plans. Remove from Plan. Specific procedures to be used at Parcel 3 must be summarized in the text of the Work Plan.
Section 6: Environmental Protection Plan	NMED does not review or approve environmental protection plans. Remove from Plan. Procedures to be used at Parcel 3, such as those for Investigation Derived Waste management, must be described in the document text.
Section 7: Property Management Plan	If not required for site, remove from Plan.
Section 8: Interim Holding Facility Siting Plan for Chemical Warfare Materiel	If not required for site, remove from Plan.
Section 9: Physical Security Plan for Recovered Chemical Warfare Materiel	If not required for site, remove from Plan.
Appendix D: Accident Prevention Plan	If submitted under separate cover, remove from Plan.
Appendix F: Uniform Federal Policy - Quality Assurance Project Plan	QAPPs are not typically project specific and NMED does not review QAPPs. Detailed methods and procedures to be used at Parcel 3 must be provided in the “Field Investigation Plan” or “Quality Control Plan” sections of the text.
Appendix G: Explosives Safety Submission	If submitted under separate cover, remove from Plan.

Revise the Plan to remove unnecessary sections and appendices, as well as to include detailed descriptions within the text of all methods and procedures to be used during the investigation. Also, organize the tables and figures in the revised document in a consistent manner as detailed above.

2. Nature and Extent of Contamination, Appendix F, UFP-QAPP, Attachment 1, Meeting Notes, p 2

Permittee Statement: “Mark Patterson noted that soil sampling should not be unnecessarily completed if receptor pathways are incomplete (i.e., the residential exposure horizon does not extend below 10 feet).”

NMED Comment: This direction is not appropriate. An integral part of all site investigations is the requirement to define the nature and extent of contamination at the site. Section VII.H.1.b, RCRA Facility Investigation Work Plan Requirements, of the FWDA RCRA Permit states, “[t]he RFI Work Plan shall include schedules of implementation and completion of specific actions necessary to determine the nature and extent of contamination and the potential pathways of contaminant releases to the air, soil, surface water, and ground

water.” Whether receptor pathways are complete or not, the nature and extent of contamination at the site must be defined and all potential exposure pathways must be addressed.

SPECIFIC COMMENTS:

3. Section 3.1, Overall Approach to Munitions Response Activities, p 3-2

Permittee Statement: “MEC (regardless of size) and metallic debris measuring 1.5 inches by 3 inches or larger will be removed from the surface and subsurface by manual digging of anomalies IAW EM 385-1-97 to depth of detection.”

NMED Comment: Depth of detection is not defined. Provide the effective depth of detection for various sized objects (e.g., 1.5”x3” objects, 40mm mortars, 75mm mortars, etc.) in the revised Plan.

4. Section 3.1, Overall Approach to Munitions Response Activities, p 3-2

Permittee Statement: “Based on previous activities and geophysical surveys, it is likely that some portions of the Inner Fence Area adjacent to the HWMU boundary will exhibit subsurface conditions that are “HWMU-like” (i.e., high concentration of WMM at depths exceeding the limit of detection for analog geophysical instruments). Such areas will require mechanized MEC procedures in accordance with EM 385-1-97 instead of the analog survey and removal procedures. Any “HWMU-like” areas will be identified in coordination with the Army, and subsurface clearance of these areas will proceed as directed in the Approved Final HWMU Work Plan, Revision 1 (AECOM 2017). Sampling and analysis requirements for any “HWMU-like” areas are presented in the Uniform Federal Policy – Quality Assurance Project Plan (UFP-QAPP) (Appendix F) for the HWMU Removal Work Plan Amendment.”

NMED Comment: The Plan provides no details on how “HWMU-like” areas will be identified if the WMM are at depths exceeding the limit of detection for analog geophysical instruments. The Plan also provides no details on clearance of “HWMU-like” areas. Reference to another work plan or a QAPP is not appropriate. Provide detailed descriptions of all work to be performed in the Inner Fence Area in the text of the Plan. Revise the Plan to include detailed descriptions of how “HWMU-like” areas within the Inner Fence Area will be cleared.

5. Section 3.10.1, Munitions and Explosives of Concern Disposal, p 3-16

Permittee Statement: “Detailed MEC disposal procedures are found in the MEC Disposal SOP.”

NMED Comment: Descriptions of all methods and procedures must be included in the Report text. References to an SOP is not acceptable. Provide detailed descriptions of all work to be performed in the Inner Fence Area in the text of the Plan. Revise the Plan to include

detailed descriptions of MEC disposal procedures that will be used within the Inner Fence Area.

6. Section 3.12, Soil Sampling for Munitions Constituents, p 3-18

Permittee Statement: “Munitions constituents (MC) sampling will not be conducted under the WP for this task. Therefore, no UFP-QAPP outlining MC sampling requirement is required for this work. However, if “HWMU-like” areas are identified and approved for removal by mechanized MEC procedures, then confirmation soil sampling will be completed IAW the HWMU Work Plan Amendment. A copy of the UFP-QAPP for the HWMU removal is included in Appendix F.”

NMED Comment: The Plan provides no details on clearance of “HWMU-like” areas. Reference to another work plan or a QAPP is not appropriate. The Permittee must provide detailed descriptions of all work to be performed in the Inner Fence Area in the text of the Plan. Revise the Plan to include detailed descriptions of how “HWMU-like” areas within the Inner Fence Area will be cleared, as well as how confirmation samples for munition-related contamination will be collected and analyzed.

7. Appendix C, Project Schedule

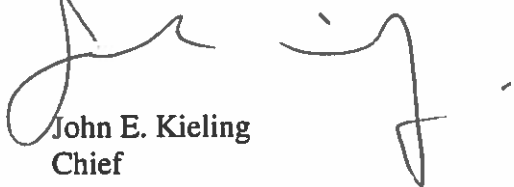
NMED Comment: The provided schedule is overly complicated and difficult to interpret. In the revised Plan, provide a simplified project schedule indicating when the field work will begin and end, as well as when a report documenting the field work and results will be provided to NMED.

Messrs. Patterson and Smith
August 30, 2017
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A revised Plan that corrects all of the deficiencies noted in this letter must be submitted to NMED no later than **November 30, 2017**. The revised Report must be accompanied by a response letter that details where the NMED's comments were addressed and cross-references the numbered comments. In addition, the Permittee must submit an electronic redline-strikeout version of the revised Report that shows where all changes were made to the Report.

If you have any questions regarding this letter, please contact Ben Wear 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 3, FWDA-17-001