

March 2, 1994

LTC. Paul E. Wojciechowski, Acting Chief  
Base Closure Division  
U. S. Army Environmental Center  
Building E-4480  
ATTN: SFIM-BCA  
Aberdeen Proving Ground, MD 21010-5401

Dear Lt. Col. Wojciechowski:

On behalf of the New Mexico Environment Department (NMED) and pursuant to the Defense/State Memorandum of Agreement (DSMOA) I have reviewed the draft final Remedial Investigation/Feasibility Study (RI/FS) for Fort Wingate Depot Activity, Gallup, NM dated January 28, 1994.

In brief, the document is generally comprehensive, well written, well organized and adequately identifies those areas that require environmental restoration prior to property transfer, with a few exceptions noted below. Consequently, my comments are directed primarily toward omissions and clarification. Not included in these comments are several minor editing problems (i.e. incorrect cross-references, misspelled words, etc.) which I provided directly to the contractor, Environmental Resources Management, INC. (ERM).

Although it is not part of the RI/FS project, I am concerned about the status of the Underground Storage Tank (UST) investigation in the vicinity of the Administration area. A discussion with NMED's UST Bureau indicates that the investigation is still ongoing under the direction of the Corps of Engineers. The status of this investigation should be discussed in the RI/FS because it has a direct bearing on the suitability of this area for transfer.

In late September 1993 NMED staff attended a meeting and site visit, including a helicopter tour of the Fort. At that time we identified the need for three groundwater monitoring wells to be placed down the arroyo from the OB/OD area; we also suggested a list of parameters which should be tested. We are assuming that these wells will be installed and sampled as part of the RCRA Closure Plan for the OB/OD area. If for any reason this is not the case, they must still be installed and monitored.

Another issue raised during the helicopter tour which was not discussed in the document is refuse in a watercourse. I believe that refuse in the Group C Disposal Area and the OB/OD area, for instance, violates the N.M. Water Quality Control Commission (NMWQCC) regulations Section 2-201 which states "No person shall dispose of any refuse



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in a natural watercourse or in a location and manner where there is a reasonable probability that the refuse will be moved into a natural watercourse by leaching or otherwise...". The fact that the investigation yielded no elevated levels of contaminants in the Group C Disposal Area does not relieve the Army of the obligation to conform to Section 2-201.

Informally you advised me that the Army would probably remove refuse piles. If this is still your intent the document should state it: I believe at the very least all refuse in the bottom or on the side slopes of arroyos or draws should be removed to more stable areas or stabilized in place; and, as stated in Appendix D, that all trash will be removed from the Southern Properties because of its probable future recreation use.

Page 2-9 indicates that the Department of Energy was a tenant at Fort Wingate. Please provide information about the duration of their stay and the types of activities DOE was involved in.

Several additional State ARARs should be added to Table 6.4. These include Section 2-201 of the WQCC regulations discussed above; toxic pollutant criteria listed in Section 1-101.ZZ and referenced in Section 3-103. A; and the NM UST Regulations which specify soil action levels in Part XII, Section 1209. A copy of both the UST and WQCC regulations have been provided to Mr. Mike Gaborek.

A review of the risk assessment (Section 9) and other supporting sections suggests the following relatively minor concerns:

The discussion of Igloo K1540 on P. 9-51 should include evidence that the areal extent of the explosives is assumed to be small; characterizing the areal extent based on one sample with elevated concentrations is not appropriate.

The discussion of residential use of igloos on P. 9-51 should clearly state that the carcinogenic risk is greater than the lower acceptance limit for both a child and adult. Your discussion of Class C carcinogens in the same paragraph is interesting but the risk is driven by 2,4-DNT, a B2 carcinogen, which produces risk greater than  $10^{-6}$  in adults and  $10^{-5}$  in children.

Under "Discussion of Alternatives" on P. 9-53, I agree that there are many conservative assumptions in this risk assessment but in no cases will the actual risk be zero, unless hazardous materials are somehow enclosed thus precluding the possibility of exposure.

On P. 9-90, in the ecological risk assessment the last paragraph indicates that areas of potential soil contamination lie mostly in the denser grassland areas. Based on my memory during site visits, and photographs provided in Section 10, this is definitely not the case

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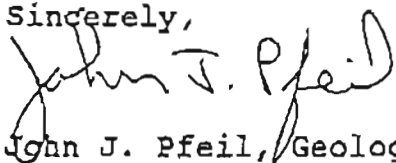
with the TNT leach beds which are essentially devoid of vegetation. The lack of vegetation, in conjunction with the leach beds serving as a buffalo wallow, presents a real possibility of contaminant migration by wind action. In addition, Figure 9-3 on P. 9-65 indicates grassland areas on the north side of the Fort represent a relatively small percentage of the entire area; in the absence of superimposing the areas of contamination on this figure it is difficult to determine whether migration due to wind action is in fact an insignificant concern.

My most serious concern is with the recommended remedial action at the TNT leach beds site. The removal and transport of contaminated material from a site that lies 1200+ feet above regional ground water to the headwaters of a major tributary of the Puerco River in a location where ground water is shallow and supports a riparian habitat does not seem reasonable for both environmental and economic reasons. Also, in discussions with both Sing Chia and Marc Sides it appears there is a significant possibility that this action may seriously complicate closure issues and may violate land disposal restrictions under RCRA. The RI/FS report does not adequately demonstrate that composting, or some other alternative, is not the most reasonable alternative at this site.

I was unable to locate a schedule in the document for the upcoming Remedial Action Plan, Record of Decision, etc. Does such a schedule exist? If so, I would like to receive a copy.

Thank you for the opportunity to review the draft final RI/FS. I believe the close coordination between the Army Environmental Center and this Department has resulted in the development of an excellent document. I look forward to reviewing the final RI/FS which will hopefully address the concerns and deficiencies discussed above.

Sincerely,



John J. Pfeil, Geologist  
Ground Water Protection and Remediation Bureau  
DSMOA Group

cc: Sing Chia, USEPA  
Marc Sides, NMED  
Joe Mirabal, BLM  
Larry Fisher, Tooele Army Depot  
Sadie Hoskie, Navajo EPA