Environmental Office

SUBJECT: Risk Assessment Completion Plan Meeting, Fort Wingate Depot Activity (FWDA), New Mexico

Dr. R. Stewart Dinwiddie
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044A Galisteo Street
Santa Fe, NM 87505

Dear Dr. Dinwiddie:

As discussed at the June 1998 BRAC Cleanup Team (BCT) meeting, the Army wishes to develop a work plan which precisely defines the approach to completing the human health and ecological risk assessment at FWDA. A kick-off meeting to discuss the risk assessment approach and provide direction for development of the risk assessment work plan is the first element in completing the FWDA risk assessments. The kick-off meeting has been scheduled for July 28 – 30, 1998, at Fort Wingate Depot Activity. At this meeting, the Army is attempting to gather appropriate representatives from New Mexico Environment Department (NMED), U. s. Environmental Protection Agency (EPA), and Department of Interior (DOI) to develop an integrated, cohesive, and robust approach for completion of the risk assessments. Participation in the meeting by personnel from your organization is critical to the success of the meeting and subsequently to the success of the FWDA risk assessments.

The Army recognizes that completion of a sound human health and ecological risk assessment is of paramount importance in achieving the goal of transferring FWDA property. If appears the timing for stepping in back at this point and developing a strategic plan for completion of the risk assessments is fortuitous. We understand Ms. Kirby Olson has joined your staff to support risk assessments at Department of Defense (DoD) installations. In addition, the EPA has a new risk assessor to fill the vacancy left by Ms. Maria Martinez. The meeting is a good opportunity to get the new personnel on site and introduce them to the program, after which they will be able to be involved in the risk assessments from inception of the completion plan to final approval of the risk assessments.
Please find attached the draft outline for the risk assessment completion plan presented at the June 1998 BCT meeting and also an agenda for the July 28 – 30 meeting. If circumstances prevent attendance by personnel working on the FWDA risk assessments or if you have any questions regarding the meeting, please contact Mr. Larry Fisher at (435) 833-3504.

Sincerely,

Thomas A. Turner

CF: w/encl

Mr. Chuck Hendrickson
U.S. Environmental Protection Agency Region VI
1445 Ross Avenue (6H-PN)
Dallas, TX 75202-2733

Mr. David Sinclair
Department of Interior
Bureau of Land Management
1474 Rodeo Road
Santa Fe, NM 87505

Ms. Julie Jacobs
New Mexico Environment Department
Ground Water Quality Bureau
1190 St. Francis Drive
Santa Fe, NM 87502

Ms. Laurie Haines
U.S. Army Environmental Center
ATTN: SFIM-AEC-RPS
Bldg. E4480 (Edgewood Area)
Aberdeen Proving Ground, MD 21010-5401

Mr. Dwayne Ford
U.S. Army Corps of Engineers, Fort Worth District
ATTN: CESWF-EV-D
P.O. Box 17300
Fort Worth, TX 76102

2
Mr. Tom Morris  
Navajo Nation EPA  
Water Quality Program  
P.O. Box 339  
Window Rock, AZ 86515

CDR, USACHPPM  
ATTN: Mr. Larry Trannenbaum  
Aberdeen Proving Ground, MD 21010-5422
Risk Assessment Task Completion Plan
Fort Wingate Depot Activity
May 1998

DRAFT

OBJECTIVE: Completion of Human Health Risk Assessment (HHRA) and Ecological Risk Assessment (ERA) which satisfies regulatory and stakeholder requirements and provides solid foundation for property transfer. Risk assessments will be tailored to meet RCRA standards, rather than CERCLA, in order to ensure a consistent base closure regulatory framework.

1. Kick-off meeting to discuss risk assessment requirements, completion plan.
   - Participants: TEAD (with COE and Contractor support), NMED, EPA, BLM
   - July ‘98

2. Develop Risk Assessment Work Plan (RAWP). Elements of RAWP to include and specify:
   - Identification of Data Quality Objectives
   - Areas of concern to be evaluated
   - Legacy data to be used in RA, how it will be used, and limitations of its use
   - Additional data to be collected
   - Screening methodologies
   - Detailed procedures to be used for risk assessment (toxicity data, selection of contaminants of concern, statistical methods, food web modeling, etc.)
   - Fate and transport considerations
   - Techniques for evaluation of exposure pathways
   - Property use following transfer
   - Assumptions to be utilized
   - Decision points and pathways based on RA results and data required for each decision
   - Uncertainty analysis techniques
   - Risk management roles and responsibilities
   - Any other items necessary to produce a risk assessment capable of supporting Army, NMED, EPA and stakeholder requirements
   - Draft RAWP completed Sept. ‘98
3. DA review of Draft RAWP
   Oct. '98

4. Submit Draft Final RAWP to NMED, EPA, BLM, and RAB
   Nov. '98

5. Meeting to discuss review comments and reach concurrence on RAWP.
   Army, NMED, EPA, BLM
   Dec '98

6. Final RAWP released as part of Admin Record
   Include meeting minutes from meetings
   Feb '99

7. Conduct additional field work (if required)
   Summer '99

8. Evaluate data, perform risk assessments
   Begin – Mar '00

9. Internal Army Review (TEAD, COE, USACHPPM)
   Sept – Oct '00

10. Review of draft risk assessments (NMED, EPA, BLM, RAB)
    Jan '01 – April '01

11. Release and approval of Final HHRA, ERA
    June '01

12. Petition for No Further Action at appropriate sites; risk management decisions at
    remaining sites; establishment of risk-based cleanup levels.
Ecological and Human Health Risk Assessments  
Completion Plan Meeting  
Fort Wingate Depot Activity  
28 – 30 July 1998

28 July

8:00 a.m. Introductions and Meeting Objectives

8:30 a.m. Site Visit  
Attempt to observe all AOCs at FWDA. While in the field a brief Description of each site and its investigative history will be given.

5:00 p.m. Exit FWDA

29 July

8:00 a.m. Define processes for completing Human Health Risk Assessment  
- Screening  
- Exposure assumptions  
- Toxicity assessment  
- Risk characterization  
- Risk management  
- Identify special receptors or exposure scenarios

12:00 p.m. Lunch

1:00 p.m. Discuss legacy data, uses and limitations

2:00 p.m. “Groundwater” considerations for FWDA risk assessments

3:00 p.m. Define processes for completing Ecological Risk Assessment  
- Screening level  
- Problem formulation

5:00 p.m. Exit FWDA

30 July

8:00 a.m. Continue defining Ecological Risk Assessment processes  
- Study design and DQO process  
- Verification of field sampling design  
- Site investigation and data analysis  
- Risk characterization  
- Risk management
12:00 p.m. Lunch

1:00 p.m. Discuss legacy data, uses and limitations

2:00 p.m. Identify receptors, food web modeling, or other specific requirements

3:00 p.m. Establish communication and coordination methods to facilitate risk assessment efforts

4:00 p.m. Summarize action items, conclude meeting

**General:** The meeting will be held at Building T-16, Fort Wingate Depot Activity. On 28 July a lunch break will be taken while in the field for the site visits, so participants should bring a sack lunch and drinks. Cameras are welcome during the site visit. Walking through brush and over rough terrain will be necessary during the site visits, so participants should wear comfortable clothes and sturdy shoes or boots.