



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 268
FORT WINGATE, NM 87316

March 16, 2009

Mr. James P. Bearzi
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Removal of Brass Casings Adjacent to Building 530

Dear Mr. Bearzi:

The Department of the Army, Fort Wingate Depot Activity (FWDA) would like to request a Permittee-initiated Interim Measures per the RCRA permit section VII.G.3 as discussed with Mr. Dave Cobrain and Ms. Tammy Diaz of your staff on February 3, 2009. The objective of this action is to remove brass casings southwest of building 530 as discussed in section 7.4.1.4 of the September 30, 2008 version of the Final Parcel 21 RFI work plan under the permit, section VII.G.3 "Permittee-initiated Interim Measures". It is believed the brass casings were treated in the deactivation furnace that was in building 530. It is believed some of the casings were dropped onto the ground when they were being loaded into rail cars for recycling.

Comment 4 of the NMED approval letter dated December 12, 2008 directed the Army to submit a work plan addressing the removal of the brass casings no later than August 31, 2009. Although the work plan states the action will be performed by "excavation and sifting of one foot of soil from the area in which the casings have been observed", the Army intends on performing the removal using in-house personnel and will follow the approach used during the Kickout Delineation Investigation. This approach substantially reduces ground disturbing activities. The Army will perform an all-metals detector assisted surface removal, while flagging all subsurface anomalies. The all-metals detectors will detect the brass casings well below the one foot proposed in the work plan. All the brass casings will be picked up, placed in a container, and stored in one of the Conditional Exemption (CE) igloos. Once the surface removal is complete, a determination will be made (based on size, amount, and type of the subsurface anomalies) if in-house Army personnel can perform the subsurface removal or if it will have to be performed by a contractor at a later date. If the determination is to perform the removal in-house, our Ordnance Explosive Safety Officer (OESS) will investigate the anomalies. If the anomalies are determined to be safe to move, they will be stored in the CE igloos until a later date when they will be rendered safe to recycle or properly disposed of in a permitted landfill. If any anomalies need to be blown-in-place (BIP), Explosive Ordnance Disposal (EOD) personnel will be called for assistance. The Army plans to take a pre and post detonation discrete soil sample at any BIP location. Also, two multi-incremental will be taken within the project area. The samples will be tested for explosives and TAL metals.

A report detailing the removal activities and what was found and how it was handled will be submitted to NMED. As part of the reporting, and the project area as well as locations of any munitions and explosives of concern (MEC) will be surveyed using GPS. The soil testing report will also be included.

If you have questions or require further information, please call me at (330) 358-7312.

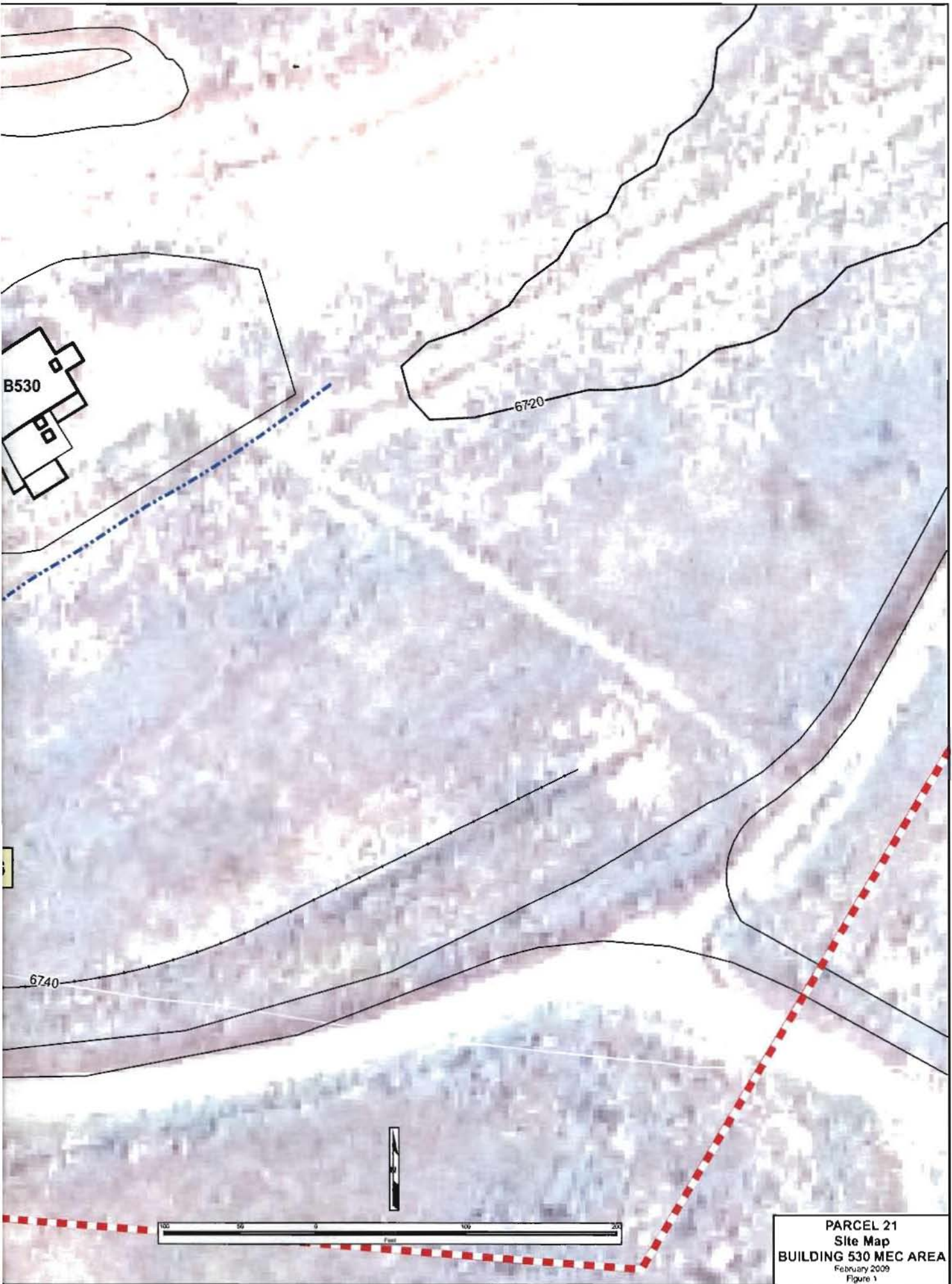
Sincerely,



Mark Patterson
BRAC Environmental Coordinator

CF:

Sharlene Begay-Platero, Navajo Nation
Edward Wemytewa, Zuni Pueblo
Clayton Seoutewa, BIA Southwest Region
Rose Duwyenie, BIA Navajo Region
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Richard Cruz, FWDA
Mark Paterson, FWDA BEC
Bill O'Donnell, BRACD
Chuck Hendrickson, USEPA Region 6
Ira May, USAEC
Steve Smith, USACE Fort Worth
David Henry, USACE Albuquerque



PARCEL 21
Site Map
BUILDING 530 MEC AREA
February 2009
Figure 1

EMPTY SHELL CASINGS

SWMU 72

SWMU 8

B537

