



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 288
FORT WINGATE, NM 87316

December 14, 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

RE: Class 1 Permit Modification request to remove Parcel 10A from the RCRA Permit

Dear Mr. Bearzi:

The purpose of this letter is to request a Class 1 RCRA Permit modification with prior approval to the Fort Wingate Depot Activity (FWDA) RCRA Permit EPA ID No. NM6213820974 (Permit). The requested modification is to remove parcel 10A from Table VII.2 of the Permit. Please note parcel 10 was split into parcels 10A and 10B as shown on the map in Attachment 2 of the Permit. The Army is not proposing the removal of parcel 10B at this time. The Permit Attachment 2 map was revised to reflect the proposed boundary change showing parcel 10A as "pending transfer" and is attached. Parcel 10A comprises part of the former explosive safety buffer area between the igloos and the northwestern boundary. Parcel 10A contains approximately 483 acres.

In accordance with the Permit, the Army researched the historical information on this parcel including aerial photographs. Additionally, the Army interviewed former employees on their knowledge of the depot. The interviews were recorded in a report titled *FWDA Summary of Interviews* dated February 20, 2007 which was submitted to the NMED and stakeholders. The interviewees did not recall any activities occurring on this parcel. Since parcel 10A was a "buffer" area for explosive safety around the igloos, no permanent structures were installed. Thus, very little information exists on parcel 10A.

The Army determined through use of GIS Parcel 10A did contain one pre-1940 World War I (WWI) wood magazine shown on the 1935 aerial photo and the FWDA Permit Attachment 2 map as F-259. This information triggered the Army to investigate the site in 2007. The results of the investigation were provided to all stakeholders on a compact disc along with the letter for the Class 1 Permit Modification request to remove Parcels 4B, 5b, and 8 on December 11, 2008. The compact disc contained the report of findings entitled *Report of Investigation for Potential Environmental Areas of Concern, FWDA* dated October 2007.

In addition, the Army recently submitted the NMED a Final Release Assessment Report for Parcel 10, dated October 2009. This document contains all the results of investigations in Parcel 10A including the above mentioned WWI magazine (identified as 35F-259). The only other investigation in Parcel 10A occurred at the extreme northwest corner of AOC44 which was the tip of a pre-1935 dirt runway. One multi-increment soil sample was taken at each site and tested for explosives and none were detected. The runway site was also tested for lead which was detected at 12 mg/kg, well below the 400 mg/kg cleanup level. Also, each site was visually inspected by Mr. David Holladay, a Tech 3 Army Ordnance and Explosives Safety Specialist. He also surveyed each site with a Schonstedt metal detector. No explosives or munitions were detected. There is a sand

and gravel loading structure on a south facing bluff which is further described in the October 2009 report. This structure will be demolished and the wood debris removed prior to transfer of the parcel.

No other structures, munitions, or releases of hazardous constituents were identified on the parcel. The Army inspected the western fence and BLM survey markers and found the fence line runs within two feet of the survey markers in the parcel.

Based on the above investigation, interviews, and research the Army believes no release of hazardous constituents has occurred in Parcel 10A. The Army is requesting the removal of Parcel 10A from the Permit via a Class 1 Permit modification because there are no Areas of Concern (except the tiny area mentioned) or Solid Waste Management Units in these parcels.

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

Sincerely,



Mark Patterson
BRAC Environmental Coordinator

Enclosures

CF:

Dave Cobrain, NMED, HWB
Tammy Diaz, NMED, HWB
Richard Cruz, Fort Wingate
Mark Patterson, Fort Wingate
Chuck Hendrickson, U.S. EPA Region 6
Sharlene Begay-Platero, Navajo Nation
Eugenia Quintana, Navajo EPA
Rose Dwywie, Navajo BIA
Steve Beran, Zuni Environmental
Edward Wemytewa, Pueblo of Zuni
Clayton Seoutewa, SW BIA
Charles Long, Navajo Council
Ben Burshia, BIA
Eldine Stevens
Judith Wilson
Bill O'Donnell, ACSIM
Ira May, USAEC

MEDIA

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