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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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RON CURRY
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 9, 2010

Mark Patterson
Ravenna Army Ammunition Plant
Building 1037
8451 State Route 5
Ravenna, OH 44266

Steve Smith
CESWF-PER-DD
819 Taylor Street, Room 3A12
PO Box 17300
Fort Worth, TX 76102-0300

**RE: NOTICE OF DEFICIENCY
FINAL OF THE RELEASE ASSESSMENT REPORT FOR PARCEL 10
FORT WINGATE DEPOT ACTIVITY, NEW MEXICO
EPA ID# NM6213820974
FWDA-09-007**

Dear Mr. Patterson:

The New Mexico Environment Department (NMED) has received the Department of the Army's (the Permittee) *Final of the Release Assessment Report for Parcel 10* (Report), dated October 2009. NMED has reviewed the Report and hereby issues this Notice of Deficiency (NOD).

COMMENT 1

The Permittee did not use standard formatting such as page numbers and line numbers in the Report. Additionally, the Report lacks organization, for example the Permittee discusses samples and includes sample identification (ID) labels in the text; however the sample IDs do not correlate with the tables or figures presented in the Report.

COMMENT 2

The Permittee applied multi-incremental (MI) sampling as the method for soil investigations throughout the Former Administration and Utilities Area (located on Parcels 10A, 10B, 7 and 9). MI sampling is not an appropriate method for characterization at this site or at the related structures, Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs).

COMMENT 3

In Section 4.5.2 (MI Soil Sampling Results at Parcel 10B) the Permittee states "MI samples were collected in 10 areas of AOC 44 that are within Parcel 10B to include the remaining former building areas most likely impacted by operations and the old runway area north of the former utilities / administration area. The samples were tested for TAL metals, semi-volatile organic compounds (SVOCs), explosives, pesticides, volatile organic compounds (VOC's), gasoline range organics (GRO), and diesel range organics (DRO) extended depending on building type and use. The samples contained the following detections: DRO, SVOC's, explosives and metals below screening levels." Several constituents were detected in the MI soil samples collected; the Permittee must therefore propose further characterization at the Former Administration and Utilities Area including the associated SWMUs and AOCs.

COMMENT 4

Soil and sediment analytical data were compared to NMED Residential Soil Screening Levels (SSLs) or if a Residential SSL has not been established for a given constituent, proposed cleanup levels were compared to USEPA Region 6 Human Health Medium-Specific Screening Levels (HHMSSLs). The most recent HHMSSLs have been replaced by EPA's Regional screening levels (RSLs), which can be found at http://www.epa.gov/earth1r6/6pd/rcra_c/pd-n/screen.htm. The Permittee must incorporate this change in all future submittals.

Various contaminants were detected by the limited soil sampling and chemical analyses conducted prior to submittal of the Report. In lieu of revising the Report, the Permittee must submit a RCRA Facility Investigation (RFI) Work Plan (Work Plan) that proposes further characterization based on the historical use or activity at each site. If historical records are not available, the Permittee must propose further characterization at all sites where known or suspected industrial operations occurred prior to dismantling of the former administration area (e.g., Feature 16: Oil and Gas Station, SWMU 26: Petroleum, Oils and Lubricants (POL) area). The scope of work must adhere to the requirements in Attachment 4 of the Resource Conservation and Recovery Act (RCRA) Permit (December 1, 2005), and follow standard formatting (e.g., sections on history, surface and subsurface conditions, previous sampling, proposed sampling, investigation methods, analytical methods). The Permittee should refer to a NMED approved Work Plan for formatting details. The Permittee must submit the Work Plan to NMED no later than June 30, 2010.

Messrs. Patterson and Smith
March 9, 2010
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If you have any questions regarding this letter, please contact Tammy Diaz-Martinez of my staff at (505) 476-6056.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc:

Dave Cobrain NMED HWB
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