



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

April 4, 2011

**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**

Dear Mr. Bearzi:

The Department of the Army, Fort Wingate Depot Activity (FWDA) has completed the Permittee-initiated Interim Measure per the RCRA Permit Section VII.G.3 as discussed in the letter to the State dated March 16, 2009. A copy is enclosed. The objective of this action was 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.

The Army performed the removal using in-house personnel. The removal was performed by a three-person team, one all-metals detector operator and two using shovels and/or rakes. See the enclosed photographs. The detector operator carried a GPS unit to track effort. A figure of the track log is enclosed. All the brass casings were picked up without incident and placed in a total of 13 five-gallon containers. The containers were then placed in one of the Conditional Exemption (CE) igloos. The casings are being stored in the CE igloo until they can be rendered safe to recycle. No other items were found.

The Army placed two multi incremental decision units consisting of 50 sub-samples over the project area as shown in the enclosed figure. The samples were tested for explosives and metals. Test results for both samples showed all constituents are below both NMED and EPA Soil Screening Levels for Residential soil. A table of lab results is enclosed. The laboratory results database is found on the enclosed compact disc.

In summary, all of the brass shell casings were removed and the soil test results indicate the soil meets the Residential Standard. Based on these findings the Army concludes this portion of Solid Waste Management Unit 72 requires no further action.

If you have questions or require further information, please call me at (330) 358-7312 or Rich Cruz, Depot Manager, at (505) 905-6109.

Sincerely,



Mark Patterson
BRAC Environmental Coordinator

Enclosures

CF w/enclosures:

Chuck Hendrickson, USA EPA Region 6
Micki Gonzales (Admin Record) FWDA
Bill O'Donnell, BRAC
Mike Kipp, AEC
Sharlene Begay-Platero, NN
Edward Wemytewa, POZ
Clayton Seoutewa, BIA Southwest
Rose Duwyenie, BIA-NR
Clayton Seoutewa, Southwest Region BIA
Judith Wilson, BIA
Eldine Stevens, BIA
Ben Burshia, BIA
Angela Kelsey, BIA
Pat Ryan (Web manager)



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 288
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:

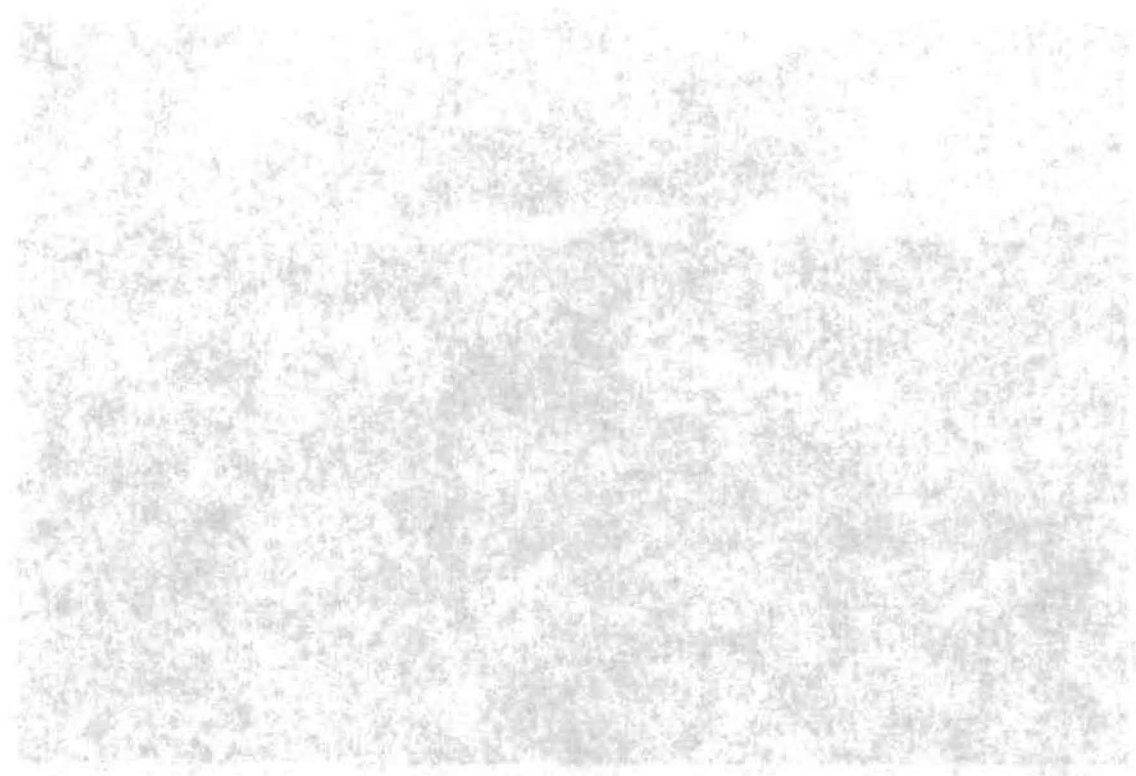
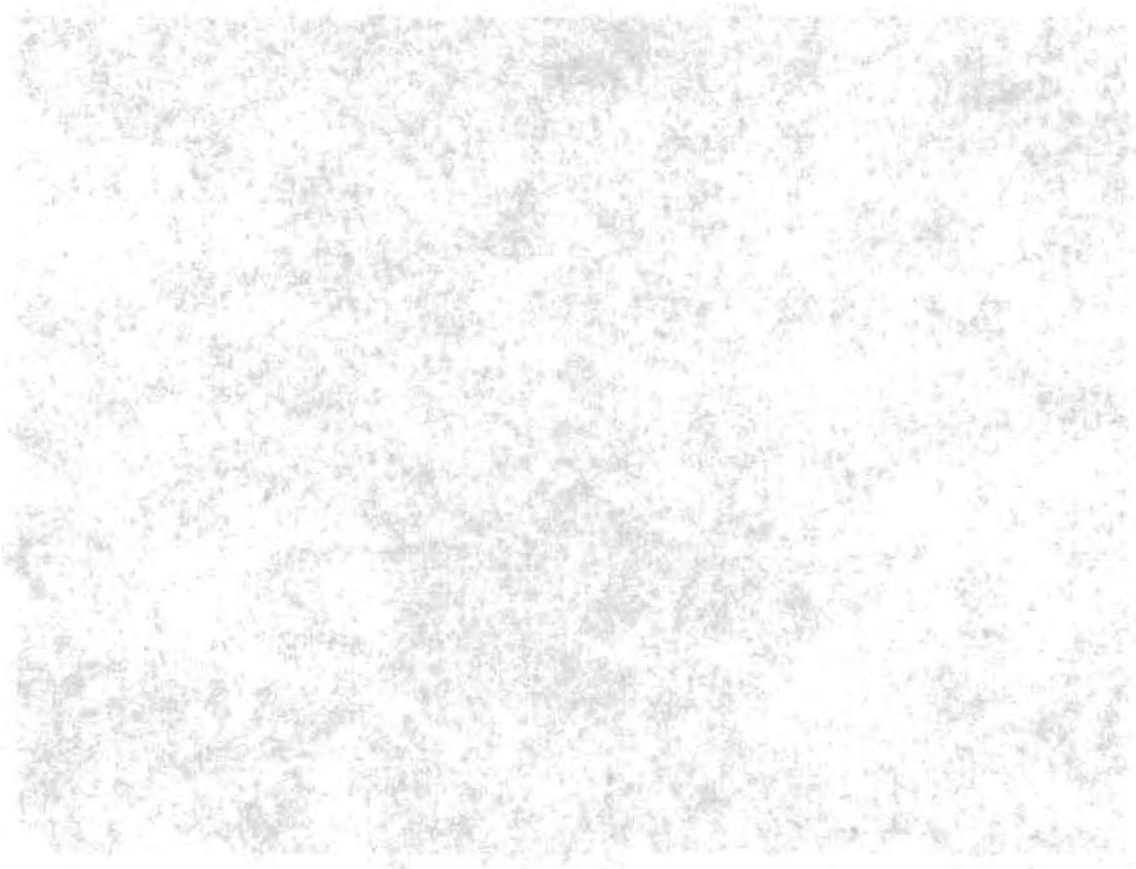
Sharlene Begay-Platero, Navajo Nation
Edward Wemytewa, Zuni Pueblo
Clayton Seoutewa, BIA Southwest Region
Rose Duwyenie, BIA Navajo Region
Ben Burshia, DOI
Ron Walker, DOI
Charles Long, Navajo Nation
Richard Cruz, FWDA
Mark Paterson, FWDA BEC
Bill O'Donnell, BRACD
Chuck Hendrickson, USEPA Region 6
Ira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



Typical 20 mm brass casings on ground surface.



Participant



PARCEL 21 - SWMU 72 - B530/BRASS CASING REMOVAL SAMPLING RESULTS

SAMPLE ID	DATE COLLECTED	METHOD	MATRIX	CAS #	ANALYTE	RESULT	REPORTING LIMIT	UNITS	LAB QUALIFIER	VALIDATION QUALIFIER	NMED SSL RESIDENTIAL	EPA RSL RESIDENTIAL	SSL / RSL UNITS	EXCEEDS NMED SSL?	EXCEEDS EPA RSL?
21728530BCSS-M1-SO	28-Sep-2010	SW846 8010C	Solid	7429-90-5	Aluminum	17000	25	mg/Kg			78100	77000	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6010C	Solid	7440-70-2	Calcium	16000	50	mg/Kg			NS	NS	mg/Kg	No Standard	No Standard
21728530BCSS-M1-SO	28-Sep-2010	SW846 6010C	Solid	7439-89-6	Iron	13000	40	mg/Kg			54800	55000	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6010C	Solid	7439-95-4	Magnesium	6200	15	mg/Kg			NS	NS	mg/Kg	No Standard	No Standard
21728530BCSS-M1-SO	28-Sep-2010	SW846 6010C	Solid	7440-23-5	Sodium	85	250	mg/Kg	J	J	NS	NS	mg/Kg	No Standard	No Standard
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-39-0	Antimony	0.021	0.094	mg/Kg	QJ	J	31.3	31	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-38-2	Arsenic	1.8	0.23	mg/Kg			3.90	3.9	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-39-3	Barium	670	0.12	mg/Kg	J	J	15600	15000	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-41-7	Beryllium	0.61	0.047	mg/Kg			156	160	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-43-9	Cadmium	0.85	0.047	mg/Kg	Q		77.9	70	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-47-3	Chromium	17	0.094	mg/Kg			113000	120000	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-48-4	Cobalt	6.3	0.047	mg/Kg	O		NS	23	mg/Kg	No Standard	
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-50-8	Copper	20	1.2	mg/Kg	J	J	3130	3100	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7439-92-1	Lead	21	0.047	mg/Kg	J	J	400	400	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7439-96-5	Manganese	620	0.047	mg/Kg	J	J	10700	1800	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-02-0	Nickel	12	0.16	mg/Kg	O		1560	1500	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7782-49-2	Selenium	0.63	0.23	mg/Kg	J	J	391	390	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-22-4	Silver	0.13	0.047	mg/Kg	Q		391	390	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-28-0	Thallium	0.1	0.047	mg/Kg			5.16	NS	mg/Kg		No Standard
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-62-2	Vanadium	19	0.23	mg/Kg			391	390	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 6020A	Solid	7440-66-6	Zinc	92	1.2	mg/Kg	J	J	23500	23000	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 7471B	Solid	7439-97-8	Mercury	2.7	0.12	mg/Kg			7.71	5.6	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	99-35-4	1,3,5-Trinitrobenzene	0.096	0.096	mg/Kg	U	UJ	NS	2200	mg/Kg	No Standard	
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	99-85-0	1,3-Dinitrobenzene	0.096	0.096	mg/Kg	U	UJ	NS	6.1	mg/Kg	No Standard	
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	118-96-7	2,4,6-Trinitrotoluene	0.096	0.096	mg/Kg	U	UJ	35.9	190	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	121-14-2	2,4-Dinitrotoluene	0.029	0.096	mg/Kg	J	J	15.7	16	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	608-20-2	2,6-Dinitrotoluene	0.096	0.096	mg/Kg	U	UJ	61.2	61	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	35572-76-2	2-Amino-4,6-dinitrotoluene	0.096	0.096	mg/Kg	U	UJ	NS	150	mg/Kg	No Standard	
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	19405-51-0	4-Amino-2,6-dinitrotoluene	0.096	0.096	mg/Kg	U	UJ	NS	150	mg/Kg	No Standard	
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	2691-41-0	HMX	0.096	0.096	mg/Kg	U	UJ	3060	3900	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	99-09-1	m-Nitrotoluene	0.19	0.19	mg/Kg	U	UJ	1560	6.1	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	99-05-3	Nitrobenzene	1.9	1.9	mg/Kg	U	UJ	49.4	48	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	88-72-2	o-Nitrotoluene	0.19	0.19	mg/Kg	U	UJ	29.1	29	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	99-89-0	p-Nitrotoluene	0.19	0.19	mg/Kg	U	UJ	244	300	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	121-82-4	RDX	0.19	0.19	mg/Kg	U	UJ	44.2	55	mg/Kg		
21728530BCSS-M1-SO	28-Sep-2010	SW846 8330B	Solid	479-45-8	Tetryl	0.19	0.19	mg/Kg	U		244	240	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8010C	Solid	7429-90-5	Aluminum	18000	24	mg/Kg	J	J	78100	77000	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6010C	Solid	7440-70-2	Calcium	23000	48	mg/Kg	J	J	NS	NS	mg/Kg	No Standard	No Standard
21728530BCSS-M2-SO	28-Sep-2010	SW846 6010C	Solid	7439-89-6	Iron	13000	39	mg/Kg	J	J	54800	55000	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6010C	Solid	7439-95-4	Magnesium	5800	14	mg/Kg	J	J	NS	NS	mg/Kg	No Standard	No Standard

SAMPLE ID	DATE COLLECTED	METHOD	MATRIX	CAS #	ANALYTE	RESULT	REPORTING LIMIT	UNITS	LAB QUALIFIER	VALIDATION QUALIFIER	NMED SSL RESIDENTIAL	EPA RSL RESIDENTIAL	SSL / RSL UNITS	EXCEEDS NMED SSL?	EXCEEDS EPA RSL?
21728530BCSS-M2-SO	28-Sep-2010	SW846 6010C	Solid	7440-23-5	Sodium	190	240	mg/Kg	J	J	NS	NS	mg/Kg	No Standard	No Standard
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-36-0	Antimony	0.014	0.095	mg/Kg	J Q	J	31.3	31	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-38-2	Arsenic	2.2	0.24	mg/Kg			3.90	3.9	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-39-3	Barium	340	0.12	mg/Kg			15600	15000	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-41-7	Beryllium	0.81	0.047	mg/Kg			156	180	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-43-8	Cadmium	0.87	0.047	mg/Kg	Q		77.9	70	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-47-3	Chromium	15	0.095	mg/Kg			113000	120000	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-48-4	Cobalt	6.3	0.047	mg/Kg	Q		NS	23	mg/Kg	No Standard	
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-50-8	Copper	8.7	1.2	mg/Kg			3130	3100	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7439-92-1	Lead	12	0.047	mg/Kg			400	400	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7439-96-5	Manganese	410	0.047	mg/Kg			10700	1800	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-02-0	Nickel	12	0.17	mg/Kg	Q		1560	1500	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7782-49-2	Selenium	0.78	0.24	mg/Kg			391	390	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-22-4	Silver	0.078	0.047	mg/Kg	Q		391	390	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-28-0	Thallium	0.14	0.047	mg/Kg			5.16	NS	mg/Kg		No Standard
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-62-2	Vanadium	20	0.24	mg/Kg			391	390	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 6020A	Solid	7440-66-6	Zinc	44	1.2	mg/Kg			23500	23000	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 7471B	Solid	7439-97-9	Mercury	0.32	0.025	mg/Kg			7.71	5.8	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	99-35-4	1,3,5-Trinitrobenzene	0.099	0.099	mg/Kg	U	UJ	NS	2200	mg/Kg	No Standard	
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	99-05-0	1,3-Dinitrobenzene	0.099	0.099	mg/Kg	U	UJ	NS	6.1	mg/Kg	No Standard	
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	118-96-7	2,4,6-Trinitrotoluene	0.099	0.099	mg/Kg	U	UJ	35.9	190	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	121-14-2	2,4-Dinitrotoluene	0.099	0.099	mg/Kg	U	UJ	15.7	16	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	806-20-2	2,5-Dinitrotoluene	0.099	0.099	mg/Kg	U	UJ	61.2	61	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	35572-78-2	2-Amino-4,6-dinitrotoluene	0.099	0.099	mg/Kg	U	UJ	NS	150	mg/Kg	No Standard	
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	19406-51-0	4-Amino-2,6-dinitrotoluene	0.099	0.099	mg/Kg	U	UJ	NS	150	mg/Kg	No Standard	
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	2691-41-0	HMX	0.099	0.099	mg/Kg	U	UJ	3090	3900	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	99-08-1	m-Nitrotoluene	0.2	0.2	mg/Kg	U	UJ	1560	6.1	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	98-05-3	Nitrobenzene	2	2	mg/Kg	U	UJ	49.4	48	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	88-72-2	o-Nitrotoluene	0.2	0.2	mg/Kg	U	UJ	29.1	29	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	99-09-0	p-Nitrotoluene	0.2	0.2	mg/Kg	U	UJ	244	300	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	121-82-4	RDX	0.2	0.2	mg/Kg	U	UJ	44.2	95	mg/Kg		
21728530BCSS-M2-SO	28-Sep-2010	SW846 8330B	Solid	479-45-6	Tetryl	0.2	0.2	mg/Kg	U		244	240	mg/Kg		

Notes:

mg/kg - milligrams per kilogram

ug/kg - micrograms per kilogram

NS - No Standard

RL - Reporting Limit

AOC - Area of Concern

SWMU - Solid Waste Management Unit

NMED SSL - New Mexico Environmental Department Soil Screening Level, as published in the Technical Background Document for Development of Soil Screening Levels, Revision 5.0. New Mexico Environmental Department, Hazardous Waste Bureau and Ground Water Quality Bureau Voluntary Remediation Program, August 2009 with updated Table A-1, December 2009.

EPA RSL - U.S. Environmental Protection Agency Regional Screening Level, as published in the Human Health Medium-Specific Screening Levels 2010. U.S. Environmental Protection Agency, Region 6, November 2010.

Lab Qualifier Codes:

Organics

- J Estimated: The analyte was positively identified; the quantitation is an estimation
- J Estimated: The quantitation is an estimation due to discrepancies in meeting certain analyte-specific quality control criteria
- M Manual integrated compound
- Q One or more quality control criteria failed
- U Undetected at the Limit of Detection

Metals

- J Estimated: The analyte was positively identified; the quantitation is an estimation
- J Estimated: The quantitation is an estimation due to discrepancies in meeting certain analyte-specific quality control criteria
- 4 MS, MSD: The analyte present in the original sample is 4 times greater than the matrix spike concentration; therefore, control limits are not applicable
- Q One or more quality control criteria failed
- H Sample was prepped or analyzed beyond the specified holding time
- V Serial Dilution exceeds the control limits
- U Undetected at the Limit of Detection

Validation Qualifier Codes:

- J Estimated (quantitatively) and tentatively usable
- U Below reporting limit
- UJ Estimated non-detect

Sample ID nomenclature:

Sample ID's consist of a combination of Parcel, AOC, Site Identifier, source of sample, increment number for sub sample identification if necessary, type of sample, and matrix.

Example: 2172B530BCSS-M1-SO or 2172B530BCSS-M2-SO

Parcel: 21

SWMU: 72

Site Identifier: B530BC (in this case it's building 530, brass casing)

Source of sample: SS (Surface Soil)

Increment number: 00x (3 digits for subsample if necessary)

Type of sample: M (Multi-Incremental), number 1 or 2

Matrix: SO (Soil)