



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

March 19, 2012

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

Dear Mr. Kieling:

The purpose of this letter is to submit the *Final RCRA Facility Investigation Report Parcel 10B*. The report was prepared for FWDA as required under RCRA Permit EPA ID No. NM6213820974. This report addresses comments presented to the Army in the New Mexico Environment Department (NMED) Approval with Direction letter for the Final of the RCRA Facility Investigation Work Plan for Parcel 10B, dated June 2010.

The following are Army responses to NMED comments.

Comment 1:

In Section 5.8 (Investigation Derived Waste Characterization and Disposal), page 5-4, the Permittee states "[a]ny excess soil will go back into the hole where the sample was taken." The Permittee may place the soil back into the hole; however, based on the analytical results the Permittee may be required to remove the soils from the borings as part of a feature remedial action and dispose of it appropriately. Therefore, the Permittee must ensure that each soil sample location is clearly marked (e.g., flag, surveyed).

Response 1:

The Army marked all sample locations with a survey stake and flagged when the October 2010 sampling event was complete. Sample locations were recorded with a global positioning system (GPS) unit for inclusion in the geographic information system (GIS) database. Locations were measured to within 1 foot accuracy. Based on the analytical results for this sampling event, no samples exceeded the December 2009 NMED SSL for residential soils or the June 2011 EPA RSL. Therefore, the removal of soil from the boring locations for disposal is not required.

Comment 2:

The Permittee includes a Historical Documents Section and Historical Drawings Section in the Work Plan. NMED does not approve historical documentation as part of the Work Plan review process. NMED only approves the proposed work at Parcel 10B and views the historical information included in the Work Plan as reference documentation.

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Response 2:

The Army agrees that the historical information included in the Work Plan was as reference documentation only. NMED approved the inclusion of the historical information as a section rather than in a companion historical summary document by email dated May 18, 2010. The approval was based on the fact that the historical information only included AOC44 and SWMU 26 so the amount of information did not make the document too large.

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

Sincerely,



Mark Patterson
BRAC Environmental Coordinator

Enclosures

CF:

Shannon Duran, NMED, HWB
Chuck Hendrickson, U.S, EPA Region 6
Micki Gonzales, Fort Wingate
Bill O'Donnell, ACSIM
Steven Smith, USACE
Mike Kipp, USAEC
Tony Perry, Navajo Nation
Darrell Tsabetsaye, Pueblo of Zuni
Clayton Seoutewa, SW BIA
Ben Burshia, DOI/BLM
Eldine Stevens, DOI/BLM
Judith Wilson, DOI/BLM
Rose Duywenie, Navajo BIA
Angela Kelsey, BIA
Pat Ryan, Fort Wingate Web Manager

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