



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

June 27, 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

RE: Response to NOD RFI Report, Parcel 21, Fort Wingate Army Depot, New Mexico
EPA ID#NM62138209074
FWDA-11-004

Dear Mr. Kieling:

The purpose of this letter is to respond to multiple comments in the above letter and to address deficiencies noted by NMED. Replacement pages (few in number) to select comments are enclosed herein and will also be emailed to NMED and all stakeholders for insertion into the Parcel 21 RFI Report dated January 14, 2011. The Army believes the responses to the selected comments and replacement pages will make the RFI Report factually correct as previously discussed with NMED staff. The remaining comments will be addressed and responded to in the Phase 2 RFI Work Plan currently underway via contract. Comments are addressed below. If you have questions or require further information, please call me at 330-358-7312.

Sincerely,

Mark Patterson
BRAC Environmental Coordinator

CF:
Shannon Duran, NMED HWB
Dave Cobrain, NMED HWB
Laurie King, U.S. EPA Region 6
Chuck Hendrickson, U.S. EPA Region 6
Tony Perry, Navajo Nation
Eugenia Quintana, Navajo Nation
Darrell Tsabetsaye, Zuni Pueblo
Steve Beran, Zuni Pueblo
Clayton Seoutewa, Southwest Region BIA
Rose Duwyenie, Navajo BIA
Judith Wilson, BIA
Eldine Stevens, BIA
Ben Burshia, BIA
Julie Hamilton, AMEC Inc

COMMENT 1

The Permittee must update Figure 2-2 (Historical Land Use and Reuse Parcel Boundaries) to identify all FWDA property that has been transferred.

Response

Comment noted. To date no additional parcels have been transferred from FWDA to the Department of the Interior, therefore no changes to Figure 2-2 were completed.

COMMENT 2

In section 3.5 (Conclusions and Recommendations), page 3-9, the Permittee discusses preparation of a Corrective Measures Study (CMS) at the TNT Leaching Beds (SWMU 1). If the Permittee intends to propose complete removal of all contaminated soils at this site, a CMS may not be necessary.

Response

Comment noted. Planned future actions will be discussed with NMED prior to implementation by FWDA. Page 3-10 has been revised to reflect a corrective measures work plan will be submitted in a future RCRA phase.

COMMENTS 3, 5-7, 9, 11-14

These comments will be addressed in the Phase 2 RFI Work Plan. Under the Work Plan the Army will be addressing NMED comments and proposing the additional sampling recommended by the Army and NMED.

COMMENT 4

At SWMU 2 (Acid Holding Pond), in Section 4, Table 4-2 (Summary of Detected Constituents in Soil Current Investigations), the Permittee lists high lab reporting limits for metals results. The Permittee must explain the high reporting limits for metals, including a comparison to the appropriate screening levels, or propose to collect additional samples at the Acid Holding Pond.

Response

Table 4-2 presents all detected concentrations of constituents that were screened against the cleanup level established by Attachment 7 of the Permit. In two instances for the metals, arsenic reporting limits (RLs) exceed the cleanup level. The elevated RLs are a result of a dilution performed by the laboratory in order to quantify the concentrations of metals in a soil sample that resulted in elevated laboratory RLs that exceed the cleanup level. The dilutions do not impact the data usability for the samples because sample result concentrations below the RL, but greater than the method detection limit (MDL), were reported. Although the RLs

were greater than the cleanup level in two samples (2102B515G1SS09-1.0D-SO, and 2102B515G2SS-0.5M-SO), the detected results were valid and were screened against the cleanup level. In one instance, the arsenic concentration exceeded the cleanup level, in the other instance, the MDL and the detected result were less than the cleanup level. Because these samples have detections of arsenic, the elevated reporting limit does not impact the data usability of the samples.

COMMENT 8

In Section 6.4 (Evaluation of Data from Current and Previous Investigations), page 6-5, the Permittee states "...[a]s noted in Section 6.3, a ground water sample was collected from TMW13 on 22 October 2009. Results are presented in a document entitled *Fort Wingate Depot Activity Ground Water Periodic Monitoring Report, October 2009 to January 2010* (USACE, 2010). As shown in that document, no PCBs were detected in the ground water sample collected from TMW13." There is no indication in that report that samples obtained from TMW13 were analyzed for PCBs. Revise the Report to remove the statement regarding PCB detections at TMW13 or cite the correct document that contains PCB chemical analytical results for well TMW13 groundwater samples.

Pages 6-4, 6-5, and 14-2 were revised to cite the correct document containing the PCB results for well TMW13. Well TMW13 was sampled for PCBs on April 15, 2010 and no PCBs were detected. The results are found in Appendix G of the *Fort Wingate Depot Activity Facility-Wide Ground Water Periodic Monitoring Report, April 2010 to July 2010*.

COMMENT 10

[10a]. *In Section 8.0 (AOC 62-Building 508, Smokeless Powder Magazine), the Permittee lists results and MDLs in Table 8-1 (Summary of Detected Constituents in Soil, Previous Investigations) that are three orders of magnitude higher than the results reported in this section and also three orders of magnitude higher than Table 9-1 (Summary of Detected Constituents in Soil) from the previous Work Plan.*

[10b]. *Table 8-1 in the Report also lists fewer results from previous investigations than Table 9-1 in the Work Plan.*

[10c]. *Table 8-2 (Summary of Detected Constituents in Soil, Current Investigations AOC 62) lists lab reporting limits and MDLs in ug/kg instead of the previous mg/kg units. The Permittee must ensure that all results are accurately reported using the correct units throughout Report. Revise the Report accordingly.*

Response

10a). Units and values reported in Table 9-1 of the Work Plan were not converted properly from ug/kg to mg/kg. This error was corrected during the preparation of Table 8-1 of the Report. Table 8-1 of the Report contains values correctly reported in mg/kg, and these values and units match those in the associated Report text.

10b). Table 9-1 of the Work Plan incorrectly lists additional results because the laboratory inadvertently omitted "U" flag (non-detect) descriptors, and a number of non-detected results were reported as detections. In addition, the non-detect results in Table 9-1 of the Work Plan were reported in ug/kg and then compared to mg/kg screening criteria, which caused many of the "U" values to "exceed" screening criteria. These discrepancies were corrected in Table 8-1 of the Report and the Report, as written, is factually correct.

10c). Column headings in Table 8-2 for laboratory RL and MDL have been corrected to indicate that the reported values are in units of mg/kg. In addition, individual values of the RL and MDL for each compound have been converted from ug/kg to mg/kg to match the column heading revisions, except for the RL and MDL for nitrocellulose that were correctly posted as mg/kg values in the columns that were incorrectly labeled.

All other tables have been reviewed in light of the above. Table 6-2 was found to have the same errors, and a corrected table has been generated.

COMMENT 15

As part of a separate Parcel 21 investigation, the Permittee did initiate an Interim Measure to remove brass casings southwest of Building 530. NMED reviewed the Brass Casings Interim Measures submittal as part of review of this Report, and had no comments.

Comment Noted.