



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

***Hazardous Waste Bureau***

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

JAMES H. DAVIS, Ph.D  
Director  
Resource Protection Division

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 16, 2012

Mark Patterson  
BRAC Coordinator  
Ravenna Army Ammunition Plan  
Building 1037  
8451 State Route 5  
Ravenna, OH 44266

Steve Smith  
USACE  
CESWF-PER-DD  
819 Taylor Street, Room 3B06  
PO Box 17300  
Fort Worth, TX 76102-0300

**RE: DISAPPROVAL  
FINAL REMOVAL WORKPLAN, HWMU, PARCEL 3  
NOVEMBER 9, 2011  
FORT WINGATE DEPOT ACTIVITY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-11-013**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has received Fort Wingate Depot Activity's (Permittee) *Final Removal Work Plan, HWMU, Parcel 3, November 9, 2011*, (Work Plan) dated November 2011 and received on November 9, 2011, 2011. NMED reviewed the Work Plan and hereby issues this Notice of Disapproval (NOD) with the following comments.

**GENERAL COMMENTS**

**Comment 1**

NMED understands the Permittee intends to establish a new Area of Contamination to manage waste generated during cleanup activities associated with the Hazardous Waste Management Unit (HWMU). The Permittee is reminded to submit a letter requesting the addition of the Area



of Contamination, which must include a map that identifies the boundary of the Area of Contamination, to NMED for approval.

**Comment 2**

NMED does not typically review Standard Operating Procedures (SOPs) or Quality Assurance Project Plans (QAPPs); however, due to the inclusive nature of these documents to this Work Plan, the SOPs and QAPPs have been reviewed. The SOPs presented in **Appendix I, Field Standard Operating Procedures** are generalized. Include SOPs which are specific to, and describe the precise activities necessary for, executing the removal activities outlined in the Work Plan. Revise the current Work Plan to provide specific descriptions of the proposed methods and procedures for conducting the removal activities, waste management, and sampling of environmental media.

**Comment 3**

**Appendices**; in the hard copy of the revised Work Plan insert a page to the “Appendices” tab which includes a list of all Appendices included on the CD attached to the Work Plan.

**Comment 4**

The footnotes in **Table 3-2 Confirmation and Characterization Soil Screening Levels, Fort Wingate Depot Activity, McKinley County, New Mexico** list the NMED 2009 Soil Screening Levels (SSLs) and the USEPA 2009 Regional Screening Levels (RSLs). NMED updated the soil screening guidance (SSG) in February 2012. Permittee is directed to use updated SSLs provided in Table A-1 (NMED Soil Screening Levels) of the NMED *Risk Assessment Guidance for Site Investigations and Remediation* February 2012. A copy of this document can be found on NMEDs website: <http://www.nmenv.state.nm.us/HWB/guidance.html> The most recent version of the SSG must now be used in the evaluation of site data instead of the NMED 2009 version. When no NMED SSL is listed for a constituent, the current update to the USEPA RSLs must be used. Correct Table 3-2 in the revised Work Plan to reflect the most current SSLs and RSLs.

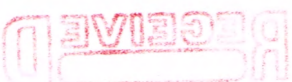
**SPECIFIC COMMENTS**

**Comment 5**

**Appendix I, Field Standard Operating Procedures**, lists **SOP No. 15, Flashing of [Munitions debris] MD** in the table of contents, however, SOP 15 is not included in Appendix I. In the revised Work Plan incorporate SOP No. 15, Flashing of MD in revised Work Plan, including details regarding the staging of materials to be flashed, flashing process, a description of potential waste generation, if any, and the transporting of flashed materials off site.

**Comment 6**

Several acronyms are used in the appendices that are not defined or on the list of acronyms (e.g., RFD, “ESS/ESP/CSS” (only ESS is on acronym list), HE, “EMR/HERO”, NONEL, PETN, ECO, DMM, HTRW) and in the Work Plan (e.g., **Section 3.11, MPPEH Inspection Process, page 3-15 line 3** the acronym for DMM is used, and it is not in acronym list). All acronyms used in the work plan and appendices must be defined when first used and also be included in the **List of Abbreviations and Acronyms** included on **page i** of the Work Plan. Revise the Work Plan accordingly.



**Comment 7**

In **Appendix E, Munitions Constituents, QAPP worksheet #15 (UFP-QAPP Manual Section 2.8.1)-Reference Limits and Evaluation Table, Analytical Group: Metals, page 15-11** the list of analytes provided indicates that the analysis of RCRA 8 metals will be performed on samples associated with the HWMU. The Permittee must analyze all samples undergoing metals analysis associated with the HWMU for Target analyte List (TAL) metals or provide justification for a more limited analyte list. Modify all associated sections of the revised Work Plan accordingly.

**Comment 8**

In **Appendix E, Munitions Constituents Sampling and Analysis Plan, QAPP Worksheet #19 (UFP-QAPP Manual Section 3.1.1)--Analytical SOP Requirements Table, page 19-1, fifth row** the Permittee states laboratory analyses for explosives will be completed via USEPA Method 8330B and that the sample volume to be collected for analysis will be 8 ounces (oz). USEPA Method 8330B requires a sample size of 1 kg (35.27 oz) if multi-incremental (MI) sampling is conducted. Propose to collect the sample volume required by USEPA Method 8330B for MI sampling, as applicable. Edit QAPP Worksheet #19 and appropriate sections of the revised Work Plan to ensure adequate sample volume is collect to obtain defensible results from laboratory analyses for explosives.

**Comment 9**

**Section 1.6.1.1 HWMU, page 1-4, last paragraph**, the Permittee states there are "...10 areas identified as Current Residue Piles (CRPs) 1 through 10..." **Figure 1-2, HWMU and CAMU Location, Figure 3-4 Proposed Excavation Areas, and Figure 3-7, Anticipated Sampling Plan** shows the locations of the CRPs, however CRP4 is not located on any of these figures. Revise relevant figures to include CRP4.

**Comment 10**

**Section 1.6.1.1 HWMU, bottom page 1-4, top page 1-5** indicates that areas impacted by open burn/open detonation (OB/OD) activities in the HWMU may lie beyond the marked boundary of the HWMU. The revised Work Plan must include a discussion regarding action(s) to be taken when newly discovered detonation craters, CRPs, and other range-related debris (RRD), which overlaps the boundary or lie just beyond the boundary of the HWMU, is encountered during HWMU investigation and removal activities.

**Comment 11**

**Section 1.6.1.1 HWMU, bottom of page 1-4 and top of page 1-5**; synopsis of historical activities at the HWMU do not include partial treatment and disposal of wastes from the trinitrotoluene (TNT) washout lagoons. Include all available information regarding waste from the TNT washout lagoons which was transported to and treated at the HWMU in the revised Work Plan.

**Comment 12**

Based on the information presented in **Section 1.14.3 1996-1998 Facility-Wide Removal Activities, page 1-10, line 19** it is not clear if Munitions and Explosives of Concern (MEC) debris was removed from the HWMU during this time period, or the estimated volume removed.

Provide clarification on the types and amount of MEC debris removed from the HWMU during this time period.

**Comment 13**

In **Section 1.14.4 1996 Phase IA – Characterization and Assessment of Site Conditions for the Soils/Solid Matrix, page 1-11, line 9** the Permittee states “[t]he trenching operations at the five detonation craters identified scattered ordnance fragments...” According to **Figure 1-2, HWMU and CAMU Location, Fort Wingate Depot Activity, McKinley County, New Mexico**, there are 12 current detonation craters (CDCs), it is unclear which five detonation craters are referenced. In the revised report, define which five CDCs are referred to in this statement. In addition, label the current detonation craters (CDCs) and CRPs on the Figure (1-2).

**Comment 14**

**Section 2.3.14 Natural Resources Manager, page 2-7** indicates a Natural Resources Manager will be responsible for managing wetland and Threatened & Endangered (T&E) surveys as well as manage compliance with the Environmental Protection Plan. Include a section listing the various governmental agencies and organizations providing technical and regulatory oversight of the wetland and T&E surveys as well as the environmental restoration of the site in the revised Work Plan.

**Comment 15**

In **Section 3.3 HWMU Boundary and Topographic Land Survey, page 3-3, line 16** the Permittee states “...will complete flyover stereo photography and generate a topographic survey of the HWMU before fieldwork begins and after the removal has been completed.” Indicate that before and after removal flyover stereo photographs and topographic surveys will be included with the final report.

**Comment 16**

In **Section 3.4.4 Processing Plant Setup, page 3-5, line 8** the Permittee states “[Geophysical digital mapping] DGM data will be collected over the footprint area, as described in Section 3.16...” Section 3.16 refers to confirmation soil sampling and not post-excavation DGM. Correct this error in the revised Work Plan.

**Comment 17**

**Figure 3-2, Processing Plant Site Map, Fort Wingate Depot Activity, McKinley County, New Mexico and Figure 3-3, Processing Plant Site Map, Fort Wingate Depot Activity, McKinley County, New Mexico** does not label the CRPs or CDCs depicted in green on the figure. CDC1 is labeled as a “Clean Stockpile”. Clearly depict the locations of the CRPs and CDCs and differentiate them from the locations of future processing plant items on a figure in the revised Work Plan.

**Comment 18**

**Figure 3-3 Processing Plant Site Map, Fort Wingate Depot Activity, McKinley County, New Mexico**, does not show the foot print of the processing plant. Depict and label the foot print of all the components of the processing plant on a figure in the revised Work Plan.

**Comment 19**

In **Section 3.5 Surface Clearance, bottom of page 3-5 to top of page 3-6** the Permittee states “[t]he HWMU will be divided into 200 foot by 200 foot grids. Each grid will be divided into search lanes to ensure complete coverage for each grid.” In the revised Work Plan provide more information regarding how many search lanes are anticipated and the width of the search lanes. **Appendix I, Field Standard Operating Procedures, Section 6.2.2.2 100 Percent Grid Survey, page 6-5, line 27** states “[g]enerally an area will be divided into 100-foot by 100-foot grids...” The grid size must be consistent throughout the revised Work Plan or justification for any differences must be provided.

**Comment 20**

In **Section 3.6 Vegetation Removal, page 3-6, line 9** the Permittee states “[r]emoved vegetation will be stockpiled outside of, but adjacent to the HWMU.” It is likely that small amounts of soil will be generated in the vegetation removal process (e.g., shallow soils around roots of vegetation) which may contain MEC and MD. No detail is given in the Work Plan regarding soils generated from vegetation removal processes, the process of screening for and removing MEC and MD, the ultimate disposal the soils or stockpiled removed vegetation. Include this information in the revised Work Plan.

**Comment 21**

In **Section 3.7 Debris and Incidental Soils Excavation, page 3-6, line 14** the Permittee states “...the anticipated excavation areas shown in Figure 3-4.” However, **Figure 3-4 Proposed Excavation Areas, Fort Wingate Depot Activity, McKinley County, New Mexico**, does not clearly depict excavation areas. In the revised Work Plan, revise all appropriate figures to clearly depict areas to be excavated using a designated key or outline color and description (e.g., anticipated excavation areas) on the relevant figure(s).

**Comment 22**

In **Section 3.7.1 Excavation Sequence, page 3-6, line 18** the Permittee states “[s]oils and debris will be excavated from the areas shown in Figure 3-4...the total quantity of debris to be excavated is provided in Table 3-1.” The four areas shown in **Table 3-1 Anticipated Quantities and Excavation Depths, Fort Wingate Army depot Activity, McKinley County, New Mexico** as ‘Other Areas of Potential Subsurface Debris’ 1 through 4, cannot be matched to corresponding areas of **Figure 3-4 Proposed Excavation Areas, Fort Wingate Depot Activity, McKinley County, New Mexico** as the areas designated as ‘Other Areas of Potential Subsurface Debris’ are not numbered on the figure. Label ‘Other Areas of Potential Subsurface Debris’ 1 through 4 on all relevant figures in the revised Work Plan.

**Comment 23**

In **Section 3.7.1 Excavation Sequence, page 3-6, line 23** the Permittee states “[e]xcavation operations will generally be completed working from...(south to north) of the arroyo to prevent re-contamination of the areas where excavation work has been performed. The Work Plan **Figure 3-3, Processing Plant Site Map, Fort Wingate Army depot Activity, McKinley County, New Mexico** show the processing plant will be set up in the southern portion of the HWMU. In the revised Work Plan, explain the procedures to prevent areas that have been

previously excavated (i.e., they lie between processing plant and area of active excavation) from being re-contaminated.

**Comment 24**

In **Section 3.7.2 Excavation Method, page 3-7, line 30** the Permittee states “[w]hen the modeled limits of an excavation have been reached, Unexploded Ordinance (UXO) technicians will complete an instrument aided visual inspection...to determine if the Digital Geophysical Mapping (DGN) verification of the excavation is appropriate.” Explain what is meant by this statement as well as provide detail on how the instrument aided visual inspection will be performed, including the instruments that will be used, in the revised Work Plan.

**Comment 25**

In **Section 3.8.1 Grizzly Feeder and Screen, page 3-9, line 14** the Permittee states “...the resulting oversize material that does not fall between the grizzly bars will transition across the grizzly to an “oversize” pile. On line 18 of the same page the Permittee states “...the oversize materials will be visually inspected by UXO technicians. Based on findings this material may be re-fed into the grizzly.” If “oversize” material is material that was too big to initially fall between the grizzly bars it is unclear why this material would be re-fed into the grizzly. Provide clarification in the revised Work Plan.

**Comment 26**

In **Section 3.8.3 Triple Deck Screen, page 3-10, line 28** the Permittee states “[m]aterials passing through the 5/8-inch screen will be deposited onto a conveyor beneath the screen. The conveyor will transport the material to a stockpile area where a rotating stacker...will spread the materials onto the stockpile.” According to **Figure 3-5 Processing Plant Schematic, Fort Wingate Army depot Activity, McKinley County, New Mexico**, there is a “post screen overhead magnet” and “metallic debris collection” station on the conveyor between the 5/8-inch screen and the stockpile area. In the revised Work Plan, describe all portions of the processing plant along with the function of each constituent.

**Comment 27**

In **Section 3.8.6 Size Reduction, page 3-11, lines 14 – 25** the Permittee describes the final step of the materials separation process which uses a hammer mill to reduce size of materials. Provide a discussion of the potential for explosive hazards while using the hammer mill and the proposed precautionary measures.

**Comment 28**

In **Section 3.8.7 Eddy Current Non-Ferrous Metal Removal** the Permittee states “[t]he entire contents of the non-ferrous waste collection from the eddy-current process will be transported to the CAMU and burned in accordance with **Appendix I, SOP No. 14...**” In the revised Work Plan, provide the details regarding the disposition of the burn residues resulting from these activities.

**Comment 29**

In **Section 3.9 Stockpile Management and Characteristic Sampling, page 3-13, line 1** the Permittee states “[results] will be compared to the contaminants listed in 40 CFR 261.31-33 as being characteristically toxic to determine if the potential exists for the soil to be hazardous.” This statement incorrectly references to 40 CFR 261.31-33, which presents listed wastes instead of 40 CFR 261.20-24 which refers to characteristic wastes. Correct this typographical error in the revised Work Plan.

**Comment 30**

In **Section 3.9.1 Stockpile Sampling Method, page 3-13, line 17** the Permittee states “[o]ne sample will be collected from each 250 cubic yard stockpile...” and on **line 22** states “[o]ne composite soil sample will be collected from five locations in each pile.” Samples must be comprised of a composite of 10 subsamples; five subsamples must be collected within the first half of the stockpile deposited from the conveyor and five subsamples must be collected from the last half of the stockpile deposited from the conveyor. Samples must be collected one to two feet below the surface of the stockpile.

**Comment 31**

In **Section 3.10 MD Flashing Process, page 3-13, line 28**, the Permittee states “[a]ll MD that is generated during the separation process will be flashed in accordance with SOP No. 15.” Although **line 16** of the first page of **Appendix I (Field Standard Operating Procedures)** lists **SOP No. 15 (Flashing of MD)**, it is not included in the appendix. Communications with USACE (conference call with Steve Smith and Eric Kirwan of USACE and & NMED on 6/22/12) indicated that this SOP has not been written yet. The revised Work Plan must include the site specific details regarding selection of materials for flashing, the treatment unit, operation of the unit, estimated soak times, segregation of treated and untreated MD, and management and disposal of any residues associated with the MD flashing process including emissions from the flashing unit (see Comment 46).

**Comment 32**

In **Section 3.11 [Material Potentially Presenting an Explosive Hazard] MPPEH Inspection Process, page 3-15, line 13**, the Permittee states “...processing MPPEH for certification as MD or RRD [as] specified in the WP...” A brief description of the process for certifying MPPEH as MD or RD was not found in the Work Plan. Provide the location(s) of the MD certification process(es), including the applicable portions of all cited reference documents as an appendix in the electronic copy of the revised Work Plan.

**Comment 33**

In **Section 3.12 MEC Disposition, page 3-16, line 31** the Permittee states “[d]onor explosives, consisting of jet perforators or pentolite boosters, will be obtained from an explosives vendor and stored in two ECMs located on Explosive Storage Block B.” According to FWDAs latest submittal of Quarterly Inventory and Inspection Reports for Igloo Block B, dated June, 18, 2012 only one Earth Covered Magazine (ECM) is currently empty. Provide clarification on donor explosives storage logistics in the revised Work Plan.

**Comment 34**

In **Section 3.13 CAMU Operation, page 3-17, line 10** the Permittee states “[a]fter construction is complete, baseline soil samples will be collected from the CAMU and analyzed for metals, explosives, perchlorate, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile compounds (SVOCs), nitrate, cyanide, polychlorinated biphenyls (PCBs), dioxins, and furans.” In the revised Work Plan, state samples will be analyzed for diesel range organics (DRO), oil range organics (ORO) and target analyte list (TAL) metals in accordance with IX.L of the FWDA Permit Modification (Permit) dated June 27, 2011.

**Comment 35**

In **Section 3.13 CAMU Operation, page 3-17, line 26** the Permittee states “[w]astes generated during CAMU operations will be characterize[d] prior to disposal. Waste requiring characterization will include ash from burn activities and soils that may have been impacted during CAMU operation. A sample will be collected to develop a waste profile for each waste stream... [c]hemical analysis will include [toxicity characteristic leaching procedure] TCLP and totals analysis will be collected for barium, chromium, lead, mercury, and 2,4-dinitrotoluene.” To develop adequate waste stream profiles, a larger analyte suite is necessary. In the revised Work Plan, add the following chemical analyses: TCLP semi-volatiles (full list), TAL metals, and dioxins and furans. The revised Work Plan must also list all analytical methods that will be used to develop waste profiles.

**Comment 36**

In **Section 3.14.1 Instrument Verification Strip [IVS], page 3-17, line 10** the Permittee states “[t]he IVS will be composed of two linear tracks 35 meters in length. Nine industry standard objectives (ISOs) or inert munitions stimulants with known characteristic responses will be aligned and buried in the first track, no closer than 5 meters apart...” It is not possible to fit nine ISOs, no less than 5 meters apart, within a linear track of 35 meters. Correct this statement in the revised Work Plan.

**Comment 37**

In **Section 3.15.2.1 Standard Data Processing and Target Selection, page 3-23, line 1** the Permittee states “[t]he locations of known cultural features recorded during the survey will be plotted on the same map. Anomalies that are in close proximity to those features will be masked and excluded from target selection.” From the information provided, it is unclear if an evaluation will be made to determine if these anomalies pose potential environmental or explosive threat, and if so, whether subsequent actions will be indicated (e.g., removal actions, notifying tribal representatives). Provide clarification and more detail in the revised Work Plan.

**Comment 38**

In **Section 3.16 Confirmation Soil Sampling, page 3-27, line 4** the Permittee states “[i]n accordance with 7.3 of Attachment 7 of the RCRA Permit, the Army may elect to propose an alternate land use scenario and associated cleanup goals for the site.” NMED is not inclined to accept less stringent cleanup levels than the residential land use scenario since the site may ultimately be returned to tribal trust.



**Comment 39**

In **Section 3.16.1 Confirmation Soil Sampling Method, page 3-27, line 21** the Permittee states “[s]amples will be collected from the bottom and sidewalls of each excavation of CDC and CRP. Each CDC and CRP will have one sample from each sidewall (north, south, east, and west) and the bottom. Samples will be collected laterally every 150 feet of sidewall and from the bottom for every 150 feet by 150 feet area.” Some CDCs and CRPs are smaller than 150 feet by 150 feet area (i.e., CDC8 is approximately 60 feet by 60 feet according to **Figure 3-7, Anticipated Sampling Plan, Fort Wingate Depot Activity, McKinley County, New Mexico**).

The sidewalls of each excavation must be sampled at a frequency of one sample for every 50 feet of sidewall or at a minimum of one sample for every sidewall that is less than 50 feet long. For sidewalls where excavation depths are greater than 20 feet below ground surface (bgs), one vertical sidewall sample must be taken for each 10 feet of depth bgs. For example, a sidewall for a 21 ft deep excavation must have two samples collected for every 50 feet of sidewall, at two different depths.

In addition, a composite sample comprised of nine subsamples is sufficient for confirmation sampling at the bottoms of CDC and CRP excavations in smaller excavation areas (i.e., 60 feet by 60 feet), however multi-incremental (MI) sampling is required for larger excavation bottoms using a minimum of 30 incremental samples. Modify the confirmation soil sampling method section in the revised Work Plan.

**Comment 40**

In **Section 3.16.1 Confirmation Soil Sampling Method, page 3-27, line 24** the Permittee states “[t]he remainder of the site will be divided into grids approximately 150 feet by 150 feet [22,500 square feet (half acre)] and a sample will be collected within each grid. See **Figure 3-7** for composite sample layout.” It is unclear from the text if the sample taken within each grid will be a composite or discreet sample, and how many subsamples will be in the composite sample. **Figure 3-7** indicates there will be nine subsamples within each single grid composite sample. All samples for grids greater than 6,500 square feet must be a comprised of 30 subsamples, for grids less than 6,500 square feet, nine subsamples per grid is sufficient. Clarify the confirmation sampling information in the text of the revised Work Plan.

**Comment 41**

From the information presented on **Figure 3-7, Anticipated Sampling Plan, Fort Wingate Depot Activity, McKinley County, New Mexico** it is unclear which areas will be excavated and sampled. Identify anticipated excavation limits and sampling locations for all areas must be added (e.g., extent of subsurface waste, area of shallow waste, other areas of potential subsurface debris, arroyo) as well as approximate anticipated excavation boundaries and sampling locations within CRPs and CDCs, on **Figure 3-7** in the revised Work Plan.

**Comment 42**

**Section 3.17 Groundwater Monitoring Well Abandonment, page 3-28, line 2**, details associated with monitoring well abandonment (e.g., number of wells, well identification numbers, copies of plugging record for each well (as submitted to the New Mexico Office of the

State Engineer)) must be included in the Report. The revised Work Plan must indicate whether or not the groundwater monitoring wells will be replaced, and if so, propose an approximate time frame for their replacement.

**Comment 43**

In **Section 3.18.2 Vegetation, page 3-28, line 28** the Permittee states “[a] seed mixture, consisting of drought tolerant species native to northwest New Mexico will be placed in areas disturbed by the removal activities...Prior to revegetation, coordination with McKinley County Extension Office will be completed to verify the most appropriate reseeding times.” In the revised Work Plan, provide a list of the plant species to be planted in HWMU after removal activities.

**Comment 44**

**Section 3.18.2 Vegetation, page 3-29, line 1** states “[a]ny wetland area’s identified during the environmental resources inventory will undergo wetland mitigation in accordance with the wetlands mitigation plan and the USACE 404 permit.” The Permittee must provide documentation in the Report that all State and Federal restoration requirements were met in accordance with Section I.C (Effect of Permit), of FWDA’s RCRA Permit.

**Comment 45**

In **Section 3.19.2 [Investigation-derived Waste] IDW, page 3-29, line 30** the Permittee states “[d]econtamination water will be containerized in drums or tanks...A characterization sample will be collected from each container sent to [the laboratory] for chemical analysis of those constituents required by the disposal facility.” In the revised Work Plan, add the following analyses, if not already required by the disposal facility, SVOCs, explosives, PCBs, dioxins, furans, and RCRA 8 metals.

**Comment 46**

In **Section 3.19.3 Recyclable Material, page 3-30, line 7** the Permittee states “[t]he voluntary flashing process is not considered treatment and therefore no wastes requiring management are anticipated from the flashing process.” It is unclear if the flashing process will produce emissions. Describe the flashing process in the revised Work Plan and explain why the flashing process is not considered treatment. The revised Work Plan must also state whether or not a permit from NMEDs Air Quality Bureau is necessary for the flashing unit (see Comment 31).

**Comment 47**

In **Section 3.19.4 Hazardous Waste Plan, page 3-30, line 15** the Permittee states “[t]he waste will be transported...to Clean Harbors or other facility permitted to accept and treat hazardous waste.” The Permittee must keep copies of waste disposal information (e.g., waste manifests) on file at the FWDA information repository as well as include electronic copies of the waste manifests in an appendix of the Report.

**Comment 48**

The location of the CAMU is not depicted on **Figure 3-1 Anticipated Haul and Evacuation Routes, Fort Wingate Depot Activity, McKinley County, New Mexico**. Add the location of the CAMU to Figure 3-1 in the revised Work Plan.

**Comment 49**

In **Section 4.5 Visitor Documentation** NMED and USEPA are not listed as authorized visitors to the site. In the revised Work Plan edit Section 4.5 to include NMED and USEPA as authorized visitors.

**Comment 50**

In the revised Work Plan, add "Site Restoration" and its associated "Inspection/Surveillance Points" needs to be added to **Table 4-1 Definable Features of Work and QC Actions, Fort Wingate Depot Activity, McKinley County, New Mexico** as a "Definable Feature of Work".

**Comment 51**

In **Section 4.13.2 Resolution, Corrective Action, and Verification, page 4-14, line 10** the Permittee States "[t]he [Nonconformance Report] NCR log will be used to track and control each non conforming condition...[and]...will be maintained in the project files and available on-site." In the revised Work Plan state that the NCR log will be included as an Appendix in the Report.

**Comment 52**

In accordance with Section I.C Effect of Permit, of the FWDA RCRA Permit, **Section 6 Environmental Protection** of the Work Plan must be amended to include reducing adverse impacts to the environment that may occur as a result of field activities (e.g., potential ponding of water, potential flooding).

**Comment 53**

**Section 6.1.5.2 Groundwater, page 6-5, line 17** is a very basic summary of groundwater for the entire FWDA facility and refers primarily to the Administration Area at FWDA. In the revised Work Plan, include a discussion of the specific hydrogeologic conditions within the HWMU, including depth(s) to the water table, and Sonsela sandstone, which outcrops in Parcel 3.

**Comment 54**

**Section 6.1.7 Cultural and Archaeological Resources, page 6-5, line 33** "[t]he Fenced Up-Horse Canyon is located on a ridge top..." This appears to be an inaccurate statement. Review documentation and make corrections as necessary in the revised Work Plan.

**Comment 55**

**Section 6.2 Mitigation Procedures, page 6-6, line 35** states "[t]he delineation report would include a mitigation plan which will detail avoidance and minimization measures related to jurisdictional wetlands." The Permittee must include an electronic copy of the wetlands delineation report as a reference document in the Report.

**Comment 56**

In **Section 6.2 Mitigation Procedures, page 6-7, line 24** the Permittee states "[t]he cultural resource monitoring is detailed in Section 3.21." Cultural resource monitoring is covered in Section 3.20. Correct this typographical error in the revised Work Plan.

**Comment 57**

In **Section 6.2 Mitigation Procedures, page 6-7, line 33** the Permittee states "MEC items disposition is detailed in Section 3.13 [MEC Disposition]." This is incorrect, Section 3.12 covers MEC disposition. Section 3.13 covers CAMU operation. Correct this typographical error in the revised Work Plan.

**Comment 58**

In **Section 6.2 Mitigation Procedures, page 6-7, line 33** the Permittee states "MD and other metallic debris disposition are detailed in Sections 3.12 [MEC disposition] and 3.20 [Cultural Resources Monitoring]." This is incorrect, Section 3.20 covers cultural resource monitoring. It is unclear which section the Permittee meant to reference. Revise the Work Plan accordingly.

**Comment 59**

In **Section 6.2 Mitigation Procedures, page 6-8, line 15** the Permittee states "IDW generated during the FWDA field activities will be disposed of as described in Section 3." Section 3.20 covers cultural resources monitoring and Section 3.19 covers IDW. Correct this typographical error in the revised Work Plan.

**Comment 60**

In **Appendix I, Field Standard Operating Procedures, SOP No. 14 Open Burning, Section 14.3 Open Burning Procedures, page 14-3, first bullet** the Permittee states "[i]f the burn is declared complete...the burn pad and immediate area may be wetted with generous amounts of water." **Section IX.G.3 Open Burning (OB)** of the Permit states "...no cool down procedures (e.g., drenching with water) shall be used, except in an emergency." Revise the open burning procedures to be in accordance with the Permit requirements.

**Comment 61**

In **Appendix I, Field Standard Operating Procedures, SOP No. 14 Open Burning, Section 14.3 Open Burning Procedures, page 14-3, second bullet** the Permittee states "...successive burns can begin at burn pads 50 feet upwind from previous burns, provided that the previously used pad has been watered or 4 hours has elapsed." **Section IX.G.3 Open Burning (OB)** of the Permit states "[w]hen a burn treatment is required...a single burn pan shall be employed." Furthermore, **Section IX.B.3 Burn Pan Design** outlines the requirements for constructing the burn pans. The use of a burn pad is not allowed for OB treatment at the CAMU. Revise the Work Plan to be in accordance with the conditions specified in FWDA's RCRA Permit (see also Comment 61).

**Comment 62**

In **Appendix I, SOP No. 14, Section 14.3 Open Burn Procedures, page 14-3, line 1** the Permittee states "[i]f the burn is declared complete and area is declared safe by the Disposal

Team Leader, the burn pad and immediate surrounding area may be wetted with generous amounts of water.” Watering down burned material is prohibited, as stated in **Section IX.G.3 Open Burning (OB)** of Permit “...no cool down procedures (e.g., drenching with water) shall be used, except in an emergency.” Revise Appendix I, Section 14 of the Work Plan to comply with the Permit.

**Comment 63**

The Work Plan does not provide the CAMU burn pan design. The burn pan must follow specifications outlined in **Section IX.B.3 Burn Pan Design** of the Permit. Provide details of Burn Pan Design in the revised Work Plan

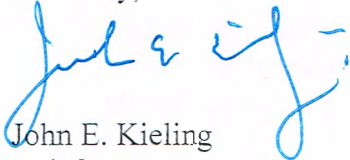
**Comment 64**

The Work Plan does not provide information regarding recordkeeping procedures for the CAMU. Recordkeeping, at a minimum, must comply with **IX.M Recordkeeping for the Treatment Operations** of the Permit. Provide details of recordkeeping procedures for the CAMU in the revised Work Plan.

The Permittee must address all comments in this NOD and submit a revised Work Plan. The revised Work Plan must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED's numbered comments. In addition, an electronic version of the revised Work Plan must be submitted identifying where all changes were made in red-line strikeout format. The revised Work Plan must be submitted to NMED no later than January 15, 2013.

If you have questions regarding this letter, please contact Lane Address of my staff at (505) 476-6059.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
S. Duran, NMED HWB  
Christy Esler, USACE  
Laurie King, U.S EPA Region 6  
Chuck Hendrickson, U.S. EPA Region 6  
Tony Perry, Navajo Nation  
Franklin Jishie, Navajo Nation  
Jason John, Navajo Nation  
Eugenia Quintana, Navajo Nation  
Steve Beran, Zuni Pueblo  
Darrell Tsabetsaye, Zuni Pueblo  
Kirk Bemis, Zuni Pueblo  
Clayton Seoutewa, Southwest Region BIA  
Rose Duwyenie, Navajo BIA  
Judith Wilson, BIA  
Eldine Stevens, BIA  
Ben Burshia, BIA

File: FWDA 2012 and Reading  
FWDA-11-01