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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 17, 2012

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

Steve Smith
USACE FWDA Program Manager
CESWF-PER-DD
819 Taylor Street, Room 3B06
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Fort Worth, TX 76102-0300

RE: APPROVAL WITH MODIFICATIONS
RCRA FACILITY INVESTIGATION WORK PLAN,
PARCEL 16
FORT WINGATE DEPOT ACTIVITY, EPA ID # NM6213820974
FWDA-11-005

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has completed its review of the U.S. Department of the Army's (the Permittee) *Fort Wingate Depot Activity (FWDA) RCRA Facility Investigation Work Plan Parcel 16*, (Work Plan) dated May 2, 2011. This submittal is a requirement of Section V.A.2 of the *Fort Wingate Depot Activity RCRA Permit (RCRA Permit)*. NMED hereby approves this Report with the following modifications. The Permittee must address the following comments in future reports as directed.

COMMENT 1

In the Executive Summary, Section 5.4 (Scope of Activities) and in the QAPP, the Permittee proposes to collect samples for semivolatile organic compound (SVOC) analysis using the multi-

incremental (MI) sampling method at the Functional Test Range 2/3 MI Focus Impact Area and the Open Storage Areas. The Permittee cannot use the MI sampling method to collect SVOC samples. Comment 90 in the NMED Notice of Disapproval for the Parcel 11 Work Plan, dated December 23, 2008, states that MI sampling is not an appropriate method for the collection of SVOC samples. The Permittee must collect discrete soil samples to test for the presence of SVOCs at Parcel 16.

COMMENT 2

The Permittee must conduct additional MI sampling in the FTR 2/3 Historical Impact Area in addition to the sampling units shown in Figure 5-3 (Locations of MI and Trench Samples for SWMU 16). The Permittee must propose additional MI sampling within the Firing Range, including at least two additional sampling units in close proximity to, and in front of, the Firing Point. At least three more MI sampling units must be proposed in the Historical Impact Area down range of the Focus Impact Area, within the Historical Impact Area. Two of the sampling units must be placed within one hundred yards of the down-range boundary of the Focus Impact Area. Update the Work Plan to include these additional MI sample locations.

COMMENT 3

In Appendix B of the Work Plan, Table 1-1 (Soil Sampling Plan) of the QAPP, the Permittee lists different COPCs for sampling in Parcel 16 than is stated in the Work Plan. For instance, in Section 5.4.1 (Contaminants of Potential Concern) for Functional Test Range (FTR) 2/3 the Permittee lists SVOCs and perchlorate as part of the analytical suite. The QAPP lists only explosives and RCRA 8 Metals for FTR 2/3. The sampling tables in the Executive Summary also differ. The Permittee must ensure that the soil samples are tested for all of the analytes listed in section 5.4.1 of the Work Plan.

COMMENT 4

In Section 5.4.2 (FTR 2/3) the Permittee describes 20 MI sampling locations. Figure 5-3 (Locations of MI and Trench Samples for SWMU 16) only displays 17 MI sampling locations. The Permittee must update this map to display all MI sampling locations, including the additional locations required by NMED in this letter. Submit a replacement Figure 5-3 to NMED no later than September 30, 2012.

COMMENT 5

In Section 5.4.4 (Geophysical Anomaly Evaluation in SWMU 16) the Permittee states that MI sampling will be conducted before trenches are dug at these anomaly locations. However, there

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are no MI samples listed in Table 5-8 (Geophysical Anomaly Sample Detail for SWMU 16). Trenches proposed at TP1, TP2, and TP3 on Figure 5-3 are not within MI sample areas. NMED is assuming that the samples associated with "Trenching" are discrete samples. All samples collected, whether they be MI or discrete, must be listed in the sampling detail tables in future Work Plans. Clarify this issue in the report summarizing the results of the investigation.

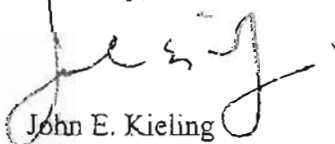
COMMENT 6

The Permittee may proceed with the sampling of the exterior of the igloos in AOC 41 as described in Section 6 of the proposed Work Plan. See Comment 5 in the NMED Parcel 6 Approval with Modifications dated August 19, 2011 for NMED's position related to interior sampling of the igloos.

No revisions to the Work Plan are necessary, with the exception of the replacement Figure 5-3; however, the Permittee must ensure that all modifications included in this letter are incorporated into the Scope of Work and are discussed in the RCRA Facility Investigations (RFI) Report. The Permittee must submit a RFI Report summarizing the results of implementation of the Work Plan to NMED on or before April 30, 2013. Additionally, the Permittee must notify NMED a minimum of 15 calendar days prior to the implementation of any field activities.

If you have questions regarding this approval please contact Shannon Duran of my staff at 505-476-6058.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: Shannon Duran, NMED HWB
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