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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 1, 2013

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**RE: APPROVAL WITH MODIFICATONS
INVESTIGATION AND REMEDIATON WORK PLAN
PARCEL 18, EASTERN LANDFILL
FORT WINGATE DEPOT ACTIVITY, NEW MEXICO
EPA ID# NM6213820974
FWDA-12-003**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) received the Department of the Army's (the Permittee) revised *Investigation and Remediation Work Plan Parcel 18, Eastern Landfill* (Work Plan) dated February 6, 2013. NMED has reviewed the Work Plan and hereby issues this Approval with the following modifications.

Comment 1

NMED's December 10, 2012 Disapproval required that the Permittee furnish "an electronic copy of the revised document with all edits and modifications shown in redline-strikeout format." The revised Work Plan submittal did not include a redline-strikeout copy of the revised document even though the cover letter included with the submittal references the redline-strikeout version. Ensure that a redline strikeout version (an electronic copy is acceptable) of the revised document

is included in future revised submittals.

Comment 2

In the Comment Response Table (Appendix A), Comment Response 9, the Permittee states, “[b]ased on current site knowledge and excavation of the similar Western Landfill at FWDA, no hazardous waste is anticipated. If hazardous waste is identified during the initial waste profile sampling, the proposed approach for remediation will be re-evaluated and the Work Plan will be modified accordingly.” There is no need to modify this Work Plan, the Permittee may contact NMED to discuss any changes in the field and then discuss the changes, in detail, in the summary Report after excavation and remediation is completed.

Comment 3

In Section 2.1 (FWDA Facility Description), the Permittee states, “[t]he landfill is reported to have been used for the disposal of garbage, trash, and debris from the Administration Area and for the burning of other solid waste from FWDA. In 1968, the landfill was closed and covered with a layer of soil.” And in Section 2.3.8 (Aerial Photography Summary) the Permittee states, “[a]erial photographs from 1948 through 2005 are included in Appendix F. Evidence from the aerial photographs indicate that the landfill was originally constructed between 1948 and 1952. Surface disturbance is less visible after 1966, indicating that the landfill was most likely not used after this time.” However, the aerial photograph from 1973 depicts more disturbance than the other photos and seems to show the cells, now designated as A-9 and A-10 and surface disturbance areas A-4 and A-5. No change is necessary; however, in the Report the Permittee must discuss the landfill use after 1968 and any waste that may have been disposed there into the early 1970s.

Comment 4

In Section 4.3 (Pre-excavation Trenching and Waste Profile Sampling) the Permittee states, “[t]he landfill disposal facility requires profile samples for each 1,000 cubic yards of waste. Although the depth of the debris in the landfill trenches is not known, it is anticipated that approximately 15,000 cubic yards of soil and debris will be excavated for landfill disposal. Therefore, a total of 15 waste profile samples are planned to be collected for analysis.” The Permittee must collect one sample per 500 cubic yards of trenched soil (for a total of 30 samples). The Permittee must sample soils that appear to be contaminated, based on field screening, for laboratory analysis. In the Report, the Permittee must provide volumes and disposal information for the debris and also describe the soils (including any discoloring or odors) and materials excavated from the landfill.

Comment 5

In Section 4.5 (Confirmation Sampling), lines 1-4, the Permittee states, “[c]omposite samples will be collected from at least every 100 feet of excavation sidewall. The total length of excavation sidewall will be measured and rounded up to the nearest 100 feet to determine the number of composite samples to be collected. The sample locations will be spaced equally along the sidewall.” Then, in lines 7-9, the Permittee states, “[e]ach sample area will consist of one discrete soil sample for VOCs and one composite sample for all other analyses. Each composite

sample will be comprised of nine subsamples randomly collected from within each sampling area." Figure 4-6 (Confirmation Sample Locations) depicts "Sidewall Samples" which do not provide adequate coverage of the excavation sidewalls. 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. In the Report describe the size of the sampling area from which the nine subsamples are collected.

Comment 6

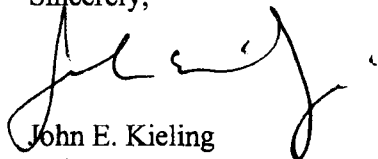
In Figure 4-6 (Confirmation Sample Locations), the Permittee depicts bottom confirmation samples for each excavation. In excavation A-8, stagger the confirmation samples on the floor to capture the center or the lowest portions of the excavation.

Once the excavation and the remediation of Parcel 18, Eastern Landfill is complete, the Permittee must submit a report summarizing the results of the removal activities and soil confirmation sampling. The report must be submitted by **March 3, 2014**.

Messrs. Patterson and Smith
March 1, 2013
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If you have questions regarding this approval please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: Shannon Duran, NMED HWB
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File: FWDA 2013 & Reading File
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