



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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Environmental Health Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 23, 2013

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
PO Box 17300
Fort Worth, TX 76102-0300

**RE: APPROVAL
PHASE 2 SOIL BACKGROUND REPORT
FORT WINGATE DEPOT ACTIVITY, NEW MEXICO
EPA ID# NM6213820974
FWDA-13-004**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) received the Department of the Army's (Permittee) *Phase 2 Soil Background Report* (Report), dated February 5, 2013 submitted pursuant to Section VII.L of the Fort Wingate Hazardous Waste Facility Permit. Based on the information presented, NMED hereby approves the Report with the following comments.

COMMENT 1

The Permittee's Phase II 2012 samples were collected from 6-12 inches below ground surface (bgs) as approved by NMED. Typically, deeper background samples are warranted since hypothetical residential receptors are expected to be exposed to soil down to 10 feet bgs. Clarify whether the 2012 background comparison values based on surface soil will be compared with site data greater than 12 inches bgs or whether the subsurface data from the 2010 background study based on the ecological zones will be used. If the 2012 data are to be applied to subsurface

soil, discuss whether the surface soil background concentrations are representative of soil greater than 12 inches bgs.

COMMENT 2

The Permittee provides general recommendations in Sections 6.1 and 6.2 as to which background comparison values should be considered for site-to-background comparisons at various sites and parcels throughout FWDA. During individual site-to-background comparisons, the National Resource Conservation Service (NRCS) soil type at each site should be verified and discussed, and appropriate background values applied at that time. Justification of the selection of background comparison values must be included in future reports submitted to NMED for approval.

COMMENT 3

The Permittee needs to clarify Table 4-1 with respect to 2009 background soil data. While 2009 and 2012 data were combined to calculate facility-wide background comparison values, the recommended arsenic background comparison for the individual soil units were calculated based on the 2012 data only. Provide additional information about 2009 data based on ecological zone, and clarify if the 2012 data based on soil type is to replace data based on ecological zones or if the two sets of data will be included in the new background comparison values for individual soil units. Provide clarification as to how the additional arsenic background comparison values for the individual soil units will be used in conjunction with the 2009 analytical results.

Provide the information required by the comments above in a response letter no later than December 6, 2013. If you have any questions regarding this letter, please contact Shannon Duran at (505) 476-6058.

Sincerely,



Dave Cobrain
Permits Program Manager
Hazardous Waste Bureau

cc: Shannon Duran, NMED HWB
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Laurie King, U.S EPA Region 6
Chuck Hendrickson, U.S. EPA Region 6
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