



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

REPLY TO
ATTENTION OF

September 10, 2013

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: Parcel 4A
Notification of Permittee-Initiated Interim Measures
Fort Wingate Army Depot, New Mexico
EPA ID #NM62138209074

Dear Mr. Kieling:

The Department of the Army respectfully submits this notification to implement Permittee-Initiated Interim Measures per the Resource Conservation and Recovery Act (RCRA) permit section VII.G.3 for the removal of soil below igloo drain outfalls and igloo drain pipes that contain lead-based paint in Block C of Parcel 4A. It is our intention to perform the measures in the September/October time frame while our contractor is onsite performing other RCRA Facility Investigation activities at several other parcels.

As documented in the Final Release Assessment Report (RAR), Parcel 4A (Revision 2), dated October 11, 2012, the Army recommended soil removal from under both drains at C-1105, C-1109, and C-1128 based on initial June 2008 data and September 2010 X-ray fluorescence (XRF) readings over the New Mexico Environment Department (NMED) soil screening criteria for lead or arsenic. Due to the inconsistencies found in data comparison between the lab data and XRF data, the Army has elected to remove soil from both drains on the three igloos. In addition, based on a September 2010 XRF reading for lead over the NMED soil screening criteria, soil would be removed on the right side of C-1124.

The Army will remove a few inches of soil from each of these igloo drain outfalls, estimated to be approximately $\frac{1}{4}$ cubic yard per drain. Soil will be disposed in accordance with applicable local, state, and federal regulations. Confirmation samples will be collected at each location and analyzed for lead to ensure concentrations are below NMED cleanup standards. If standards are exceeded, additional soil will be removed until the standard is met. If a safety hazard exists after soil removal, soil will be replaced with soil from one of the nearby revetment berms which have already been tested for lead and explosives and found to have concentrations below cleanup standards.

During the same time frame as the soil removal, the Army will also remove drain pipes and plug holes from all igloos in block C. The pipes will be recycled. Igloos C-1551 and C-1552 each have two drains that extend down to approximately 2 feet below grade into concrete. The Army will remove and properly dispose the piping and concrete below the surface. Soil samples will be collected at each of the four locations and analyzed for RCRA metals and explosives. Upon receipt of analytical results, the holes will be backfilled if results confirm the samples are below the Soil Screening Levels.

As discussed in the RAR, the Army has decided to include transformer I-25 in the Parcel 4A RAR so that all issues within Area of Concern 29 are addressed in one document and because Parcel 4A is ahead of Parcel 2 in the Permit schedule. The Army will collect one soil sample under the former I-25 transformer location for analysis of polychlorinated biphenyls. All chemical testing for the proposed work will be done by a Corps approved lab. XRF will not be used.

Following completion of the interim measures, a brief letter report documenting our findings will be submitted for your approval.

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
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