

---

---

**FACT SHEET / STATEMENT OF BASIS**

**Notice of Intent to Approve a Class 3 Permit Modification  
to Grant Corrective Action Complete Status for  
Five Areas of Concern and Removal of Three Land Parcels  
from Within the Facility Boundary**

*RCRA Permit Number NM6213820974*

**FORT WINGATE DEPOT ACTIVITY  
NEW MEXICO**

**December 2013**

---

---

## **FACT SHEET / STATEMENT OF BASIS**

### **Notice of Intent to Approve a Class 3 Permit Modification to Grant Corrective Action Complete Status for Five Areas of Concern and Removal of Three Land Parcels from Within the Facility Boundary**

**RCRA Permit No. NM6213820974**

Under authority of the New Mexico Hazardous Waste Act (Section 74-4-1 *et seq.*, New Mexico Statutes Annotated (NMSA) 1978, as amended, 1992) and the New Mexico Hazardous Waste Management Regulations (20.4.1 [New Mexico Administrative Code] NMAC), the New Mexico Environment Department (NMED) intends to approve, pending public input into this decision, a Class 3 permit modification request (PMR) received from the Department of Army/Fort Wingate Depot Activity (Permittee) for the Hazardous Waste Permit (Permit) pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42(c)).

If approved, the proposed modifications would grant Corrective Action Complete (CAC) status for five (5) AOCs 71, 78, 82, 87 and 93 and remove three (3) Parcels 5A, 12 and 14 from within the facility boundary at the FWDA. Currently, Table 1 in Permit Attachment 8 of FWDA's Resource Conservation and Recovery Act (RCRA) Permit lists Solid Waste Management Units (SWMUs) and AOCs at the FWDA facility where corrective action is necessary to characterize and remediate past releases of hazardous wastes or hazardous waste constituents. If this modification is approved by NMED, AOCs 71, 78, 82, 87 and 93 (five sites total) would be transferred from Table 1 in Permit, Attachment 8 to Table 4 that lists SWMUs and AOCs with the status of Corrective Action Complete without Controls. The removal of Parcels 5A, 12, and 14 will modify the Facility boundary.

FWDA is located at the following address: Fort Wingate Depot Activity, McKinley County, New Mexico. FWDA's primary contact for this action is: Mr. Mark Patterson, Ravenna Army Ammunition Plant, Building 1037, 8451 State Route 5, Ravenna, OH 44266. Telephone: (330) 358-7312.

#### **A. Facility Description**

FWDA is located in McKinley County, New Mexico, approximately eight miles east of the City of Gallup. FWDA covers approximately 24 square miles. In 1918, the Army established the munitions depot. From 1918 until its closure in 1993, the installation stored, tested, reconditioned and demolished ammunition. Open-burning detonation, incineration, and bomb washout were the principal demilitarization methods used. Past practices resulted in the release of ordnance-related and other industrial wastes to Base structures and the environment.

## B. History of Investigation

The FWDA Permit requires investigation of SWMUs and AOCs listed in Attachment 8 of the Permit. Section H of this fact sheet briefly describes the location, history, evaluation of relevant information, and the basis for determination for each of the AOCs proposed for corrective action complete without controls. More detailed descriptions of the AOCs can be found in the permit modification request submitted by the Permittee and the references listed at the end of this fact sheet which constitute the administrative record for this action.

The following sites are the subject of this proposed permit modification:

<b>AOC</b>	<b>Description in Permit</b>
71	Former rectangular structures north of Bldg. 528, Parcel 21
78	Feature 18 on 1973 aerial photo (API-5) in 1995 Archive Search Report, Parcels 4A, 5A, and 6.
82	Area adjacent to the east of Feature 18 on 1973 aerial photo (API-5) in 1995 Archive Search Report that includes drainage swale, wetland and arroyo, Parcel 6.
87	Feature 18 on a 1962 aerial photo (API-3) and Feature 23 on 1973 aerial photo (API-5) in 1995 Archive Search Report, Parcel 21.
93	Biovac and Tank Training Area, Parcels 12 and 14.

AOCs 78, 82 and 93 are the only units located in Parcels 5A, 12, and 14. Therefore, once AOCs 78, 82 and 93 achieve Corrective Action Complete without controls status, these Parcels qualify for removal from the Facility.

## C. Administrative Record

The Administrative Record for this proposed action consists of Fact Sheet/Statement of Basis, the Public Notice, and the December 2005 (Revised June 2011) Permit that contains Tables 1 and 4 in Attachment 8 and the Class 3 Permit Modification Request, dated October 2011. The Administrative Record may be reviewed at the following location during the public comment period:

NMED – Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
(505) 476-6000  
*Monday - Friday from 8:00 a.m. to 5:00 p.m.*

A copy of the above mentioned documents are also available electronically on the NMED website at:

<http://www.nmenv.state.nm.us/hwb/fwdaperm.html>.

To obtain a copy of the Administrative Record or a portion thereof, in addition to further information please contact Ms. Pamela Allen at (505) 476-6064, or at the address provided above. NMED will provide copies, or portions thereof, of the administrative record at a cost to the requestor.

#### **D. Public Participation**

Public meetings were arranged by the Permittee and held on November 2, 2011 at the Red Rock State Park Conference Center –Conference Room, Red Rock State Park, Gallup NM 87301, in accordance with 20.4.1.901 NMAC as part of the Permittee's 60-day public comment period on the Permit Modification Request (PMR) required by the regulations at 40 CFR §270.42(c)(5). NMED did not receive any comments from the public during the comment period provided by the Permittee.

NMED issued a public notice on **December 19, 2013**, to announce the beginning of a 60-day comment period that will end at 5:00 p.m. MDT **February 17, 2014**. Any person who wishes to comment on this action or request a public hearing should submit written or electronic mail (e-mail) comment(s) with the commenter's name and address to the physical or e-mail address below. Only comments and/or requests received on or before 5:00 p.m. MDT, **February 17, 2014** will be considered.

Dave Cobrain, Program Manager  
Hazardous Waste Bureau - New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303  
Or via e-mail: [dave.cobrain@state.nm.us](mailto:dave.cobrain@state.nm.us)  
Ref: FWDA Class 3 Permit Modification Request

Written comments must be based on the administrative record. Documents in the administrative record need not be re-submitted if expressly referenced by the commenter. Requests for a public hearing shall provide: (1) a clear and concise factual statement of the nature and scope of the interest of the person requesting the hearing; (2) the name and address of all persons whom the requestor represents; (3) a statement of any objections to the proposed action, including specific references; and (4) a statement of the issues which such persons propose to raise for consideration at the hearing. Written comments and requests for Public Hearing must be filed with Mr. Dave Cobrain on or before 5:00 p.m. MDT, **February 17, 2014**. NMED will provide a thirty (30) day notice of a public hearing, if scheduled.

## **E. Next Steps**

After consideration of all public comments received, NMED will issue a final decision that will approve, modify or deny the request. If NMED modifies or denies the request, NMED will provide written justification for the decision to the Permittee's by mail. NMED will make the final decision publicly available and will notify the Permittee's and each person who submitted written comments of the final decision. The final decision will constitute a final agency decision and maybe appealed as provided in the Hazardous Waste Act.

## **F. Contact Person for Additional Information**

For additional information, contact the following individual:

Dave Cobrain, Program Manager  
Hazardous Waste Bureau - New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303  
Telephone: (505) 476-6000  
Fax: (505) 476-6030  
e-mail: dave.cobrain@state.nm.us

## **G. Arrangements for Persons with Disabilities**

If any person requires assistance, an interpreter or auxiliary aid to participate in this process, please contact Juan-Carlos Borrego at the NMED Human Resources Bureau, Room S-4303, 1190 St. Francis Drive, P.O. Box 5469, Santa Fe, New Mexico 87502. Mr. Borrego's telephone number is 505-827-0424. TDY users please access Mr. Borrego's number through the New Mexico Relay Network at 1-800-659-8331.

## **H. Description of AOCs Proposed for Corrective Action Complete without Controls**

### **1. AOC 71, Former Rectangular Structure**

#### **Location**

AOC 71 was identified in two separate locations and designated AOC 71A and AOC 71B within Parcel 21. AOC 71A is a former rectangular structure located immediately north of TMW-5 about 40 feet from Arterial Road No. 6 and north of Building 528. AOC 71B is located south of Arterial Road No. 6 and west of Normal Maintenance Avenue.

#### **History**

Based on historical review AOC 71A is believed to be the foundation of one of the pre-1940s magazines, specifically Magazine K-302. Military munitions and components

were potentially handled and stored in these areas. Information reviewed suggests that no hazardous wastes were handled at AOC 71A and no releases of hazardous wastes or hazardous constituents occurred from operations.

Based on the 1945 historical map A-7-70, AOC 71B was determined to be the temporary storage location, T-324. A ditch and berm are located on the south end of the scarred area. No significant findings for AOC 71B were noted during the 1958 through 1997 aerial photo review.

Based on historical documents provided, no evidence exists to suggest that AOC 71 was a potential source of a release of contaminants. NMED's basis for listing AOC 71 came during a site visit in 2001 where "a rectangular concrete foundation (16 feet by 40 feet) reinforced with rebar and anchor bolts" was located.

### **Evaluation of Investigation Results**

Both AOC 71A and AOC 71B were investigated through a facility-wide investigation of former open storage sites; using a multi-incremental sampling method. Surface soil samples were collected and analyzed for explosives.

Explosives were not detected in any of the samples. Aluminum was detected in one sample at a concentration below the New Mexico Residential Soil Screening Level (SSLs).

### **Basis of Determination**

AOC 71A and AOC 71B located in Parcel 21 have been determined to be suitable for Corrective Action Complete without Controls. Contaminants were not detected in soil samples obtained from AOC 71 and it does not pose an unacceptable level of risk to human health and the environment under a residential land use scenario.

## **2. AOC 87, Feature 18 on the 1962 Aerial Photo API-3 and Feature 23 on the 1973 Aerial Photo API-5**

### **Location**

AOC 87 is Feature 18 on the 1962 aerial photo API-3 and Feature 23 on the 1973 aerial photo API-5. Feature 18 is located in the northeast quadrant of Parcel 21 directly south of Building 515 and is described to be a graded area, rough with a shallow pit and approximately 3.4 acres in size. Feature 23 is located in Parcel 21 with the western portion of the area located in Parcel 6; it is described as a rough and scarred area of approximately 12 acres.

### **History**

A historical review of available records and documents as well as observations during site reconnaissance determined that the location identified as Feature 18 was a pre-1940s

magazine, specifically Magazine K-303. Feature 23 was identified as a pre-1940s magazine, specifically Magazine K-304.

The historical document review and observations made during the site reconnaissance suggested that no releases of hazardous wastes or hazardous constituents occurred from operations at AOC 87, with the exception of one small area. This area will be addressed in future corrective action associated with AOC 68 and SWMU 2, which are co-located with a portion of AOC 87.

There is no evidence to suggest AOC 87 poses an unacceptable risk to human health or the environment.

### **Evaluation of Investigation Results**

Based on the historical information suggesting no evidence or likelihood of a release of hazardous waste or hazardous constituents at AOC 87, samples were not collected.

AOC 87 has two areas to be characterized separately in future actions with the co-located SWMU 2 and AOC 68.

### **Basis of Determination**

AOC 87 has been determined to be suitable for Corrective Action Complete without Controls. There is no evidence that a release of contaminants occurred from former operations at AOC 87 and it does not pose an unacceptable level of risk to human health and the environment under a residential land use scenario.

## **3. AOC 78/82, Feature 18**

### **Location**

AOC 78 is listed in the Permit as Feature 18 on 1973 aerial photo (API-5) in 1995 Archive Search Report. AOC 82 is listed as Area adjacent to the east of Feature 18 on 1973 aerial photo (API-5) in 1995 Archive Search Report that includes a drainage swale, wetland and an arroyo. During investigations these AOCs were investigated together and called AOC 78/82, Feature 18.

AOC 78/82 is Feature 18 located in the far southwest portion of Parcel 6, extending into Parcels 5A and 4A. There are four sub-areas to AOC 78/82 that are identified as A through D from south to north.

### **History**

The historical review for this area indicates that AOC 78/82 has four sub-areas identified as A through D and was used as Open Storage Sites or as Standard Ammunition Magazines. Temporary building numbers of Z-228, Z-224 or Z-227, and Z-223 or X-23 were identified from south to north for sub-areas A through D. Munitions were temporarily stored at these locations from the 1940s to 1960s.

## **Evaluation of Investigation Results**

AOC 78/82, Feature 18 was solely used for the temporary storage of munitions. In 2006 the aerial photograph analysis reported no significant findings on any of the photos reviewed from 1935 to 1997 other than scarred earth.

During the 2008 site reconnaissance surface soil samples were collected at each of the AOC 78/82 sub-areas and analyzed for explosives and lead. Seven explosive compounds and lead were detected below the compound-specific NMED residential SSLs for soil.

A digital geophysical mapping of AOC 78/82 sub-areas A through D was performed in 2008. Based on the findings all anomalies were determined to be metallic scrap debris and not munitions or explosives of concern. The debris recovered consisted predominantly of nails with minor amounts of other metallic scrap such as angle iron, metal banding, and bailing wire. The metallic scrap recovered is consistent with the known operational history of these sites. The metallic scrap recovered is believed to be remnants or debris from the former open storage structures that were removed in the 1960s.

## **Basis of Determination**

AOCs 78 and 82, Feature 18 have been determined to be suitable for Corrective Action Complete without Controls. The AOCs have been characterized in accordance with the current applicable state and federal regulations. Risk screening evaluation indicates that the detected contaminants do not pose an unacceptable level of risk to human health and the environment under the residential land use scenario.

## **4. AOC 93, Bivouac and Tank Training Area**

### **Location**

AOC 93 is located on Parcel 14 and extends into Parcel 12. Parcel 14 encompasses approximately 479 acres at the north end of the Facility. It is bounded to the west by Parcel 12. Parcel 14 is bounded to the north by Interstate 40 and to the south by Parcels 13, 16, and 18, which consist of the Water Tower Area, Functional Test Ranges 2 and 3 and Igloo Block K, and the Eastern Landfill, respectively. It is bounded to the east by undeveloped buffer land comprising Parcel 15 which was transferred from the Army to the Department of Interior (DOI) in 2001. Parcel 12 encompasses approximately 160 acres of the FWDA. Parcel 12 is undeveloped land between the Administration Area and Interstate Route 40 and is traversed by the entrance road to the administrative cantonment area. It is bounded to the south by Parcel 11, which contains the Administration Area. Parcel 12 is bounded to the north by Interstate 40 and to the west by Parcel 10B, which is undeveloped land that at one time contained the former Administration and Utilities Area.



## **History**

AOC 93 is described as the Bivouac and Tank Training Area where portions of AOC 93 were used by New Mexico National Guard units to conduct training exercises. The historical document review revealed that weapons were not fired during National Guard training activities which took place no more than three times per year. Equipment utilized included M42 Duster anti-aircraft tanks equipped with two 40 mm cannons and one 0.30 caliber machine gun and was trucked from Gallup, NM to FWDA. The ordnance for the Dusters was not issued for training exercises that occurred at FWDA. Fuel was transported in by tanker truck and refueling was conducted over drip pans by a licensed specialist. No munitions were fired from the National Guard's equipment and small arms training was conducted at the existing FWDA small arms range that is not located within AOC 93 as part of the National Guard training exercises. At the end of each training exercise, the equipment was returned to Gallup.

## **Evaluation of Investigation Results**

The Final RCRA Facility Investigation Work Plan for Parcels 12, 14 and 25, dated 2008, did not indicate that releases of hazardous wastes or hazardous constituents occurred from operations at this location. The historical documents review revealed that weapons were not fired during National Guard training activities which took place no more than three times per year.

AOC 93 was sampled on two separate events. The results of the soil sampling were reported in the Army's Final Release Assessment Report. The July 2009 soil sampling event was conducted at the borrow pit and ground scar trench areas surrounding a debris pile area. The second sampling event was conducted in September 2009 on all of the debris pile areas after all of the debris had been removed. The samples were analyzed for 8 RCRA metals, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), semi-volatile organic carbons (SVOCs), diesel range organics (DROs), and asbestos.

Based on the release assessment investigation conducted at AOC 93, no detected compounds exceeded their associated NMED residential SSL.

## **Basis of Determination**

AOC 93 is proposed for Corrective Action Complete without Controls. Based on the evaluation of the release assessment at AOC 93 the contaminants present, do not pose an unacceptable level of risk to human health and environment under the residential land use scenario.

## References:

New Mexico Environment Department (NMED), 2005., Fort Wingate Depot Activity RCRA Permit, NMED Hazardous Waste Bureau, December.

NMED. 2006., *TPH Screening Guidelines*. Hazardous Waste Bureau, Ground Water Quality Bureau, and Voluntary Remediation Program, Santa Fe, New Mexico, October.

TerranearPMC, 2008. *Release Assessment Report Parcel 21*. Fort Wingate Depot Activity, Fort Wingate, New Mexico. February.

CH2M Hill, 2008. *Final Geophysical Investigation Plan for Parcel 6, Fort Wingate Depot Activity*, June.

NMED, 2008. *RCRA Facility Investigation Work Plan Parcels 12, 14, and 25*, Fort Wingate Depot Activity, McKinley County, New Mexico, TerranearPMC, June.

NMED, 2008. *Letter, Parcel 21 Release Assessment Report, February 7, 2008, FWDA-07-003, Fort Wingate Depot Activity, New Mexico*, July.

NMED, 2008. *Guidance for Assessing Ecological Risks Posed by Chemicals: Screening-Level Ecological Risk Assessment*, Revision 5.0, Hazardous Waste Bureau, Ground Water Quality Bureau, and Voluntary Remediation Program, Santa Fe, New Mexico July.

NMED, 2008. *Letter, RCRA Facility Investigation Work Plan, Parcels 12, 14 and 25, Fort Wingate Depot Activity Approval with Modification*, NMED Hazardous Waste Bureau, August.

United States Environment Protection Agency (USEPA). 2008. *Regional Screening Levels for Chemical Contaminants at Superfund Sites*. September

Baca, 2009. *Fort Wingate Exercises Statement Letter*, New Mexico National Guard, Lieutenant General (Retired) Edward D. Baca, February.

NMED, 2009. *Technical Background Document for Developing of Soil Screening Levels, Revision 5.0*, Hazardous Waste Bureau, Ground Water Quality Bureau, and Voluntary Remediation Program, Santa Fe, New Mexico, August.

NMED, 2010. *Second Notice of Disapproval RCRA Facility Investigation Work Plan for Parcel 6*, Fort Wingate Depot Activity, New Mexico, October.

United States Army Corps of Engineers (USACE), 2011, *Approved Final Release Assessment Report, Parcel 12 and Parcel 14*, Fort Wingate Depot Activity, New Mexico, January.

USACE, 2011. *Final-NMED Revised RCRA Facility Investigation Work Plan, Parcel 6, Fort Wingate Depot Activity, McKinley County, New Mexico, March.*