



DEPARTMENT OF THE ARMY
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WASHINGTON, DC 20310-0600

December 8, 2020

Base Realignment and Closure Operations Branch

Mr. Kevin Pierard
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Final Hazardous Waste Management Unit Progress Status Report, 2019, Army's Response to the New Mexico Environment Department Letter of Disapproval dated August 28, 2020. Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974, HWB-FWDA-20-006

Dear Mr. Pierard:

This letter is in reply to the New Mexico Environment Department (NMED) Letter of Disapproval dated August 28, 2020, reference number HWB-FWDA-20-006, Final Hazardous Waste Management Unit Progress Status Report, 2019 dated June 23, 2020. The following are Army's response to NMED comments, detailing where each comment was addressed and cross referencing the numbered NMED comments.

Comments:

SPECIFIC COMMENTS

NMED Comment 1: Permittee Statement: "This status report has been prepared in response to a request by the New Mexico Environment Department (NMED) for an update on field operations and sampling results pertaining to the Removal Action at the Hazardous Waste Management Unit (HWMU) (Open Burning/ Open Detonation [OB/OD] Unit) (FTWG-002-R-01), at Fort Wingate Depot Activity (FWDA), McKinley County, New Mexico."

NMED Comment: A reference to the NMED's letter requiring the status reports (NMED's [Response to the Permittee's] Extension Request for the Parcel 3 Hazardous Waste Management Unit Investigation and Remediation Report, dated April 18, 2019) must be included in the statement. Also, the reference "FTWG-002-R-01" is not included in Section 5, References. Include the reference in Section 5, as appropriate.

Army Response, Concur. Section 1.1 has been revised as follows: "This Status Report has been prepared in response to a request made by the New Mexico Environment Department (NMED) in a letter dated April 18, 2019 (NMED 2019a). The letter requires the Army to submit annual Status Reports describing the work completed through the end of the previous calendar year at the Hazardous Waste Management Unit (HWMU) (Open Burning/Open Detonation [OB/OD] Unit), at Fort Wingate Depot Activity (FWDA), McKinley County, New Mexico."

Reference to “FTWG-002-R-01” is related to Army’s internal site tracking database and will be removed from the report.

NMED Comment 2: Permittee Statements: “After OB/OD operations were completed within the detonation craters, residual material and wastes were placed around the HWMU, typically pushed onto or over the arroyo bank.”

NMED Comment: Since residual material and wastes were pushed onto or over the arroyo bank, munitions debris and associated residual contaminants may be found farther downstream in the arroyo. After removal activities in the HWMU is complete, soils along the arroyo must be investigated appropriately. No revision required.

Army Response, Concur. No text revisions required per the comments.

NMED Comment 3: Permittee Statement: “If the stockpile soil sample results indicated that screening criteria have been exceeded, but were below hazardous waste disposal criteria, the soil was hauled to the Northwest New Mexico Regional Solid Waste Authority landfill.”

NMED Comment: In Appendix A, residential soil screening levels for the analytes are listed; however, hazardous waste disposal criteria are not provided. Provide information regarding the hazardous waste disposal criteria in the revised Report.

Army Response, Concur. A new table (Table 1-1 titled Landfill Disposal Criteria) has been added to describe the disposal criteria, and a reference to the table has been added to the text in Section 1.4.2.

NMED Comment 4: Permittee Statement: “Confirmation soil samples were collected from the excavation. Due to the varying size and shape of each excavation, a composite sample was collected for every 100 ft of linear sidewall. If the excavation exceeded 20 ft in depth, a composite sample was collected for every 10 ft of depth [for] every 100 ft of sidewall. Composite samples were also collected from the bottom of each 100 ft by 100 ft (i.e., 10,000 square ft) excavation (URS 2013).”

NMED Comment: The locations where confirmation samples were collected in each grid are not presented in the Report. Provide separate figures that present sampling locations in the revised Report.

Army Response, Concur. Figure 2-1 has been revised to include an inset feature which shows a typical sampling pattern.

NMED Comment 5: Permittee Statement: “Each composite sample consisted of nine subsamples randomly collected from within each sampling area.”

NMED Comment: Provide information regarding the composition of the composite samples (e.g., weight or volume of each subsample, mixing method) in the revised Report.

Army Response, Concur. The fifth paragraph of Section 2.2.2 has been revised as follows: “Each composite sample was composed of 16 subsamples (each subsample approximately 50 to 60 grams) randomly collected from within each sampling area. Subsamples were

combined into a decontaminated or disposable bowl and thoroughly mixed with the sampling spoon. The samples were submitted...”.

NMED Comment 6: Permittee Statement: “Refer to Section 2.2.1.1 for field QA/QC procedures and samples.”

NMED Comment: If field QA/QC procedures are identical between stockpile and confirmation sampling, clarify that in the revised Report.

Army Response, Concur. Section 2.2.2.1 has been revised as follows: “The field QA/QC procedures used during confirmation soil sampling match the procedures described for the stockpile soil sampling, which are described in Section 2.2.1.1.”

NMED Comment 7: Permittee Statement: “Table 3-2 summarizes chemicals with a detection limit greater than the NMED SSL. One chemical (N-Nitrosodimethylamine) exhibited this quality. There were no detections of N-Nitrosodimethylamine in any of the soil samples submitted for laboratory analysis.”

NMED Comment: Even if the compound was not detected, the concentration of the compound may still exceed the screening level because the detection limit is greater than the screening level. The Permittee has previously been directed to provide analyses whose method detection limits, reporting detection limits, and practical quantitation limits are below the applicable screening level for each contaminant of concern. All data provided by analyses where the method detection limit, reporting detection limit, or practical quantitation limit exceed the screening level are considered data quality exceptions and should be noted as such in the revised Report. These data cannot be used to demonstrate compliance.

Army Response, Concur. The third paragraph of Section 3.1 has been revised as follows: “...submitted for laboratory analysis. Until recently, laboratory instrumentation did not allow for the N-Nitrosodimethylamine detection limit to meet the screening level. The Army is aware of this issue and recognizes the NMED considers this a data quality exception. The Army is currently working with the NMED on resolution of this issue.”

NMED Comment 8: Permittee Statement: “Some metals, such as manganese, have screening values that are more conservative for construction workers. Metals are initially screened against established background values. Generally, those metals with nonresidential screening values lower than residential screening values are lower than background. Therefore, background values would supersede the lower risk screening values.”

NMED Comment: In case of arsenic, NMED previously directed the Permittee to use the higher risk screening value rather than lower background value. Similarly, the use of higher background values relative to lower risk screening values is acceptable. However, if metals concentrations are detected above risk screening values but below background values, such detections must be identified. No revision required.

Army Response, Concur. No text revisions required per the comment.

NMED Comment 9: Permittee Statement: “104 items were determined to be unacceptable to move and were destroyed by detonation in the HWMU at the end of each day.”

NMED Comment: If the items were destroyed by detonation in designated areas within the HWMU, indicate the locations where they were destroyed in a separate figure. Since detonation of MEC items may potentially disperse munition debris and contaminate soils in the vicinity, propose to investigate for the presence of munition debris and contaminated soils outside the detonation craters, if such areas are not covered by the survey grids presented in Figures 1-3 and 2-1.

Army Response, Concur. Figure 3-1 has been revised to show detonation in place locations within the HWMU. Text has been added to the end of Section 3.3.2 as follows: “MEC disposal of unacceptable to move items were detonated within the HWMU (i.e., within a HWMU grid that still requires excavation and processing). Following disposal operations, the detonation crater and surrounding area was inspected by qualified UXO technicians to ensure no explosive hazards remain and recovered MD was removed. Detonation in place operations occurred in HWMU Grid H25 (shown on Figure 2-1), which will undergo excavation and sampling in the future. The detonation in place location is also shown on Figure 3-1.”

NMED Comment 10: Permittee Statement: “In 2019, two MEC items were located during DGM clearance activities near Grids D11 and D12. Further excavation was completed to recover these two items, and DGM was reperformed for clearance following the excavations.”

NMED Comment: Provide information regarding the depths where the items were recovered during digital geophysical mapping (DGM) in the revised Report.

Army Response, Concur. Section 3.3.1.2 has been revised as follows: “Further excavation was completed to recover these two items, and DGM was reperformed for the clearance following the excavation. The items detected during the DGM survey were located at six inches and 14 inches below ground surface and were removed. The item locations are illustrated in Figure 3-1.”

NMED Comment 11: Permittee Statement: “Remedial activities at the FWDA Parcel 3 HWMU area have been in operation from 2011 to current.”

NMED Comment: Section 1.1, Introduction, lines 7, page 1-1, states, “[r]emoval action operation have been conducted at FWDA since 2012.” Presumably, there is a typographical error in the statement or the remedial activities conducted in 2011 were different from the removal activities discussed in the status report. Explain the nature of the remedial activities conducted in 2011 or correct the typographical error in the revised Report.

Army Response, Concur. Section 1.1 has been revised as follows: “Removal activities have been conducted at the HWMU since 2012.”

Section 4 has been revised as follows: “Removal activities at the FWDA Parcel 3 HWMU area have been conducted from 2012 to current; however,…”.

The report was also reviewed and revised, as needed, to correct inconsistencies or conflicting information.

NMED Comment 12: Permittee Statement: “Most items were properly disposed of within the CAMU area; however, items that were designated unacceptable to move were detonated within the HWMU.”

NMED Comment: Clarify that the CAMU is located in SWMU 14 rather than the HWMU. Include a map that presents the locations of both the CAMU and SWMU 14 in the revised Report.

Army Response, Concur. A description of the CAMU location and a CAMU location have been added to Figure 1-2 and included in Section 3 of the revised report where MEC and MEC disposal are first introduced. Text has been added to Section 3.3.2 as follows: “MEC disposal of acceptable to move items was conducted within the CAMU. The CAMU and Solid Waste Management Unit (SWMU) 14 are located approximately one-half mile north of the HWMU. The CAMU and SWMU 14 locations relative to the HWMU are shown on Figure 1-2.”

Disposal of unacceptable to move MEC items were detonated within the HWMU (i.e., within a HWMU grid that still requires excavation and processing).

NMED Comment 13: Permittee Statement: “Approximately 733,000 pounds (366.5 tons) of MD was removed, inspected, designated as MDAS, flashed, and recycled in 2019, with a total of 4.68 million pounds (2,341 tons) of MDAS removed since the beginning of the removal activities in 2012.”

NMED Comment: The summary section must also include information regarding (1) the total volume of soil treated, (2) the survey grids where confirmation samples were collected and absence of contamination was confirmed, if applicable, and (3) the grids where soils are planned to be treated in the following year (2020). Include the information in the revised Report.

Army Response, Concur. The third paragraph of Section 4 has been revised as follows: “Approximately 126,000 cubic yards of soil was excavated and processed through the closed-loop processing plant in 2019. A total of 416 stockpile...”.

Text has been added to the end of the third paragraph of Section 4 as follows:

“...summarized in Table 3-1. Confirmation samples were collected and confirmed the absence of contamination in the following 18 grids during 2019: B17 through B19, C17 through C20, and D10 through D20 as shown on Figure 2-1. It is expected that the following grids will be excavated, processed, and sampled in 2020: D9, E7 through E9, F7 through F9, G7 through G9, H7 through H9, B21 through B22, C21 through C22, and D21 through D22.”

If you have questions or require further information, please contact me at George.h.cushman.civ@mail.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,

George H. Cushman IV

George H. Cushman IV
BRAC Environmental Coordinator
Fort Wingate Depot Activity
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Enclosures

CF:

Dave Cobrain, NMED, HWB
Ben Wear NMED, HWB
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Subject: Final HWMU Progress Status Report, 2019 Army's Response to Disapproval, Fort Wingate Depot Activity
Attachments: Final HWMU Progress Status Report_2019_ Army Response_Disapproval_8Dec2020.pdf

Mr. Pierard,

The attached letter is in reply to the New Mexico Environment Department letter of disapproval dated August 28, 2020, reference number HWB-FWDA-20-006, Final Hazardous Waste Management Unit Progress Status Report, 2019 dated June 23, 2020.

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If you have questions or require further information, please contact George H. Cushman at George.h.cushman.civ@mail.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245(Mobile).

Sundance Consulting, Inc., under contract with the U.S Army Corps of Engineers, is respectfully submitting the attached letter on behalf of the Army.

Thank you,

Christy Esler | Program Manager

Sundance Consulting, Inc.

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