

DEPARTMENT OF THE ARMY

FORT WINGATE DEPOT ACTIVITY P.O. BOX 268 FORT WINGATE, NM 87316

February 11, 2015

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: NOTIFICATION OF SUBMITTAL OF FINAL INTERIM MEASURES WORK PLAN FOR PARCEL 21, SOLID WASTE MANAGEMENT UNIT (SWMU) 1 AT FORT WINGATE DEPOT ACTIVITY, MCKINLEY COUNTY, NEW MEXICO

Dear Mr. Kieling:

The Department of the Army respectfully submits the Final Interim Measures Work Plan (IMWP) for the excavation, transportation, and offsite disposal of impacted soils at Solid Waste Management Unit (SWMU 1) within Parcel 21, also known as the **Trinitrotoluene (TNT) Leaching Beds and Building 503**. It is our intention to complete the Interim Measures (IM) during the spring/summer of 2015 time frame.

The U.S. Army Corps of Engineers (USACE) has completed numerous investigations at SWMU 1 from 1983 to 2014, and has concluded that based on data collected from all sampling events that there are analytes (mainly TNT, RDX, and select metals) that are present in SWMU 1 soils at concentrations that exceed residential New Mexico Environment Department (NMED) Soil Screening Levels (SSLs) or Environmental Protection Agency (EPA) residential Regional Screening Levels (RSLs), site-specific background concentrations for select metals (mainly arsenic), or sample-specific calculated cumulative risk/hazard thresholds for residential site use.

Based on the conclusions from all investigations and the SSL/RSL comparison, metals background comparison, and cumulative risk calculations, the Army intends to excavate, transport, and dispose (off-site) of SWMU 1 soils that exceed residential risk/hazard-based standards (SSLs/RSLs or cumulative risk) to the maximum residential exposure depth of 10 feet. The IMWP describes the Army's approach to completing this IM. All soil is expected to be transported for disposal as non-hazardous solid waste at the San Juan County Landfill in Aztec, New Mexico.

Additionally, the Army would like the NMED to be aware that an amendment to this IMWP through a contract modification is likely to be

forthcoming prior to the initiation of SWMU 1 fieldwork. The purpose of this amendment will be to describe changes to the IMWP and procedures that will be proposed to complete additional soil excavation, transportation, and disposal in order to be protective of groundwater from leaching in addition to being protective of residential exposures.

Sincerely,

Mark Patterson BRAC Environmental

Wash Patterson

Coordinator

CF: Media: John Kieling, NMED HWB Two Hard Copies, Two Disks Dave Cobrain, NMED HWB (sent to John Kieling) Vicky Baca, NMED HWB (sent to John Kieling) Chuck Hendrickson, U.S. EPA Region 6 One Hard Copy, One Disk FWDA Administrative Record Two Hard Copies, two Disks Bill O'Donnell, BRACD One Disk Steven Smith, USACE Fort Worth Dist. One Hard Copy, Two Disks Neal Navarro, USACE Sacramento Dist. One Disk David Henry, USACE Albuqueruque Dist. One Hard Copy, One Disks Larry Rodgers, Navajo Nation One Hard Copy, Seven Disks Sharlene Begay-Platero, Navajo Nation Cover letter only Governor Val Penteah, Zuni Pueblo One Hard Copy, Eight Disks Clayton Seoutewa, SW Region BIA Zuni One Hard Copy, One Disk Kurt Dongoske, Zuni Historic Preservation Cover Letter only Eldine Stevens, DOI/BIA One Disk Judith Wilson, DOI/BIA One Disk Rose Duwyenie, BIA-NR One Hard Copy, Two Disks Angela Kelsey, BIA One Disk Administrative Record, Ohio One Disk