



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

February 6, 2020

Base Realignment and Closure Division

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 Groundwater Supplemental RFI Work Plan Revision 4, dated March 23, 2018
Request for Work Plan Deviations, Fort Wingate Depot Activity, McKinley County, New
Mexico, EPA #NM6213820974.

Dear Mr. Pierard,

This letter requests permission to deviate from the reporting procedures for the Groundwater Supplemental Resource Conservation and Recovery Act (RCRA) Facility Investigation at Fort Wingate Depot Activity. The reporting procedures for this RCRA Facility Investigation (RFI) are provided in the Work Plan titled Final Groundwater Supplemental RFI Work Plan Revision 4, dated March 23, 2018 (WP). This WP was approved by the NMED on April 18, 2018. This request pertains to removal of the Human Health Risk Evaluation from the RFI report. Details are provided below:

Section 8 of the WP identifies submittal of a Human Health Risk Evaluation as part of the northern area groundwater RFI report. In lieu of deriving site-specific risk based screening values, the Army prefers at this time to rely upon the generic screening values from Section 7.1 of Attachment 7 of the RCRA permit. This section references a hierarchy utilizing the New Mexico Water Quality Control Commission standards, Environmental Protection Agency (EPA) drinking water MCLs, or the EPA regional screening levels (RSLs) for tap water as threshold criteria for human health protectiveness.

If you have any questions or require further information during the interim, please call me at (505) 721-9770.

Sincerely,

PATTERSON.MAR
K.C.1229214493

Digitally signed by
PATTERSON.MAR.K.C.1229214493
Date: 2020.02.06 12:15:08 -05'00'

Mark Patterson
BRAC Environmental Coordinator

CF:

Dave Cobrain, NMED HWB
Ben Wear, NMED HWB
Michiya Suzuki, NMED HWB
Chuck Hendrickson, U.S. EPA Region 6
Ian Thomas, BRACD

Steven Smith, USACE
Cheryl Montgomery, USACE ERDC
Saqib Khan, USACE
Dave Becker, USACE
Sharlene Begay-Platero, Navajo Nation
Kelly Noble, Pueblo of Zuni
Mark Harrington, Pueblo of Zuni
Clayton Seoutewa, BIA Zuni
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Jennifer Turner, DOI
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Christy Esler

From: Christy Esler <cesler@sundance-inc.net>
Sent: Thursday, February 06, 2020 2:45 PM
To: Kevin Pierard (kevin.pierard@state.nm.us); (dave.cobrain@state.nm.us); Ben Wear (benjamin.wear@state.nm.us); Michiya Suzuki; hendrickson.charles@epa.gov; Ian Thomas (ian.m.thomas2.civ@mail.mil); Patterson, Mark C CIV (US); Steven Smith (steve.w.smith@usace.army.mil); Saqib SWF Khan (Saqib.Khan@usace.army.mil); Dave Becker (Dave.J.Becker@usace.army.mil); Sharlene Begay-Platero; Kelly Noble (Kelly.Noble@ashiwi.org); Mark Harrington; Clayton Seoutewa; B.J Howerton; Oliver Whaley; george.padilla@bia.gov; Jennifer Turner
Subject: Final Groundwater Supplemental RFI Work Plan Rev. 4, dated 23 Mar 2018- Request for WP Deviations, Fort Wingate Depot Activity
Attachments: Final GW Supplemental RFI WP Rev4_dated March 23_2018 Request for WP Deviations Ltr_6Feb2020.pdf

Mr. Pierard,

The attached letter requests permission to deviate from the reporting procedures for the Groundwater Supplemental Resource Conservation and Recovery Act, Facility Investigation at Fort Wingate Depot Activity.

If you have any questions or require further information during the interim, please contact Mark Patterson at 505-721-9770 or mark.c.patterson.civ@mail.mil.

FedEx Tracking Number- 8149 6545 7206

Respectfully submitted,

Christy Esler | Program Manager
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Woman-Native American- Owned Small Business
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