



State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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JOHN A. SANCHEZ
Lieutenant Governor



BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

Rec'd
2-20-18
h.m.p.

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

February 16, 2018

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

Steve Smith
USACE
CESWF-PER-DD
819 Taylor Street, Room 3B0
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATION
FINAL PERMITTEE-INITIATED INTERIM MEASURES REPORT PARCEL 16
REVISION 1.0
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-16-010**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Final Permittee-Initiated Interim Measures Report, Parcel 16, Revision 1.0* (Report), dated December 22, 2017. NMED has reviewed the Report and hereby issues this Approval with Modification. The Permittee must address the following comment.

In the Permittee's Response to Comment 4 of the *Disapproval*, dated March 29, 2017, the Permittee states, "[a]nalysis of soil during the RFI investigation showed 1 detection of TNT (720 mg/kg) in 1 incremental sample from 1 pad (Z135-4) above the SSL in effect at the time of the RFI investigation (39 mg/kg, NMED, 2012) in the 6-12 inch soil horizon." The reported explosive compound concentrations for incremental samples must be multiplied by the number of subsamples for hot spot evaluation at the Open Storage Areas. Since the 2,4-dinitrotoluene concentration in the same incremental sample was reported as 0.32 mg/kg and the number of subsamples were 50, the concentration should have been reported as potentially 16 mg/kg which indicates that a

subsample location could contain concentrations that exceed the screening level of 15.69 mg/kg. Since the Permittee has excavated the soils to eliminate potential contamination at the site, no further actions are warranted. However, the Permittee must implement the interpretation of incremental sampling results (i.e., multiplication of reported concentration by the number of subsamples) in all future plans and reports.

Although some metals concentrations (e.g., arsenic, lead) exceeded the screening levels in incremental samples at the site, the detections are not unusual for the area; it is believed that these detections of metals are not related to a release. Accordingly, additional corrective action is not required at the site related to the igloo exteriors.

Should you have any questions, please contact Ben Wear of my staff at (505) 476-6041.

Sincerely,

A handwritten signature in blue ink, appearing to read "John E. Kieling". The signature is stylized with a large loop at the beginning and a long horizontal stroke extending to the right.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
B. Wear, NMED HWB
M. Suzuki, NMED HWB
C. Hendrickson, U.S. EPA Region 6
L. Rodgers, Navajo Nation
S. Begay-Platero, Navajo Nation
M. Harrington, Pueblo of Zuni
C. Seoutewa, Southwest Region BIA
G. Padilla, Navajo BIA
J. Wilson, BIA
B. Howerton, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.

File: FWDA 2018 and Reading, Parcel 16, FWDA-16-010