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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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JAMES C. KENNEY
Cabinet Secretary Designate

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 1, 2019

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 3B06
Fort Worth, TX 76102

**RE: CLARIFICATION ON SUBMITTAL DATES FOR MULTIPLE DOCUMENTS
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA # NM6213820974
HWB-FWDA-MISC**

Dear Messrs. Patterson and Smith:

NMED recently performed a tracking audit for the Fort Wingate Depot Activity (Permittee) administrative record. Upon review, four approval letters provided by NMED to the Permittee were found to not include a specific submittal date for the next document in the progression. While it has been conveyed to the Permittee that approval of a work plan indicates approval of the schedule presented in the work plan, confusion has been apparent. Therefore, NMED is providing this letter as clarification. The table on the following page provides the NMED tracking number, the document title, the rationale for the submittal date, and the submittal date. Two of the four dates have already been surpassed; therefore, the Permittee must submit extension requests for those two reports as soon as possible in order to remain in compliance with the facility's Permit.

RECEIVED
2/9/19

Document Submittal Date Summary Table


NMED Tracking Number	Document Title	Explanation	Submittal Date
FWDA-11-013	HWMU Removal Work Plan	The work plan was approved on 1/24/13, 153 days after the 8/24/12 date proposed in the schedule. The work plan schedule proposed that the report be submitted on 4/22/15. Adding 153 days to that, a submittal date of 9/22/15 was established.	9/22/15
FWDA-15-001	Groundwater Supplemental RFI Work Plan	The work plan was approved on 4/18/18, 63 days prior to the date proposed in the schedule. The work plan schedule proposed that the report be submitted on 4/12/19. Subtracting 63 days from that, a submittal date of 2/8/19 was established.	2/8/19
FWDA-15-004	Interim Measures Work Plan MEC KO Area	The work plan was approved on 5/8/15, 55 days after the date proposed in the schedule. The work plan schedule proposed that the report be submitted on 9/21/18. Adding 55 days to that, a submittal date of 11/15/18 was established.	11/15/18
FWDA-16-007	Interim Measures Work Plan Parcel 21 – SWMU 1 – TNT Leaching Beds	The work plan was approved on 10/31/17. The project schedule listed in Section 3.13 indicates that the report would be submitted to NMED 599 days following work plan approval. Therefore, a submittal date of 6/22/19 was established.	6/22/19

In addition, NMED's December 30, 2017 Approval with Modifications letter for the *Northern Area Background Well Installation Letter Work Plan* failed to include the requirement for submittal of a Well Installation Report. The Well Installation Report must include details of the soil boring and well installation for the background wells proposed in the *Northern Area Background Well Installation Letter Work Plan*, including descriptions of work performed in the field, boring logs, well construction diagrams, well development methods, water quality data, and analytical data for initial groundwater sampling. The Well Installation Report must be submitted to NMED for review no later than **June 28, 2019**.

Messrs. Patterson and Smith
February 1, 2019
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If you have any questions regarding this letter, please contact Ben Wear at (505) 476-6041.

Sincerely,



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
T. Perry, Navajo Nation
S. Begay-Platero, Navajo Nation
M. Harrington, Pueblo of Zuni
C. Seoutewa, Southwest Region BIA
G. Padilla, Navajo BIA
J. Wilson, BIA
E. Stevens, BIA
R. White, BIA
C. Esler, Sundance Consulting, Inc.

File: FWDA 2019 and Reading