



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

January 10, 2022

George H. Cushman
Headquarters, Department of the Army
Office of the DCS, G-9
Army Environmental Office, Room 5C140
600 Army Pentagon
Washington, DC 20310-0600

**RE: APPROVAL WITH MODIFICATIONS
CORRECTIVE ACTION MANAGEMENT UNIT (CAMU) BIENNIAL SOIL SAMPLING EVENT
PARCEL 3 CLOSURE AND CORRECTIVE ACTION
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-19-004
HWB-FWDA-21-005**

Dear Mr. Cushman,

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity (Permittee) *Corrective Action Management Unit (CAMU) Biennial Soil Sampling Event Parcel 3 Closure and Corrective Action*, dated January 21, 2020 (2019 Report) and October 18, 2021 (2021 Report). NMED has reviewed the Reports, and hereby issues this Approval with Modifications with the following comments.

COMMENT FOR THE 2019 REPORT

1. Data Validation for VOCs, Pages 11 and 12 of 1284

NMED Comment: The text notes that some sample results for acetone, methylene chloride, and 2-butanone were qualified as "U" based on professional judgement. The only line of evidence (LOE) offered in support of this statement is that all three constituents are known laboratory contaminants.

Examination of Appendix VII, Summary of Common Laboratory Contaminants,

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313
Telephone (505) 476-6000 - www.env.nm.gov

Concentration Requirements, and Risk Assessment Implications (Appendix), of the US Environmental Protection Agency's (USEPA) Guidance for Data Usability shows acetone, methylene chloride, and 2-butanone are potential laboratory contaminants. The Appendix also notes that sample concentrations less than ten times that detected in the method blank should be reported as undetected for these three constituents. In addition, the Appendix states that if the constituent concentration is greater than ten times the blank concentration, the constituent should be included in the risk analysis.

Other evidence for inclusion of these constituents in the risk analysis is also provided in the Appendix (e.g., include acetone if concentrations are less than ten times the method blank and there are multiple chlorinated volatile analytes detected). According to the data provided in the CAMU Sampling Report, acetone was detected at a concentration over ten times that found in the method blank (0.005 milligrams per kilogram [mg/kg] "U" versus 0.057 mg/kg "U") and one detection of 2-butanone is equal to ten times the level measured in the method blank. To safeguard against exclusion of potential risk from the screening analysis, review the method blank and site sampling results for acetone, methylene chloride, and 2-butanone and provide additional LOEs supporting the assertion that the concentrations are indicative of laboratory contaminants and not contamination from the CAMU. Ensure the LOE provided are based on the recommendations in the Appendix. Include all constituents in the risk analysis for which such LOEs cannot be provided.

No revision to the Report is required. However, the comment above must be addressed in the next biennial sampling event report, as necessary.

COMMENT FOR THE 2021 REPORT

2. Discussion of Results, Sample Analysis, lines 25-27, page 5

Permittee Statement: "The collected samples were submitted for analysis of explosives by EPA method 8330B, TAL metals by EPA method 6020A, mercury by EPA method 7471B, DRO/ORO by EPA method 8015D, and perchlorate by SW6850."

NMED Comment: The results and discussion regarding volatile organic compounds (VOC) analysis were included in the 2019 Report. However, VOC analysis was not conducted or reported in the 2021 Report. Explain why VOC analysis was not conducted during this reporting period in a response letter.

The Permittee must address all comments in this letter and submit the response letter required by Comment 2 no later than **February 26, 2022**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the

Mr. Cushman
January 10, 2022
Page 3

document.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 690-6930.

Sincerely,



Rick Shean
Chief
Hazardous Waste Bureau

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

File: FWDA 2022 and Reading