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: Final Interior Igloo Work Plan, Parcel 4, Area of Concern 29 and Igloo Block C Submission, Fort Wingate Depot Activity, McKinley County, New Mexico  

Dear Mr. Kieling:  

In preparation for transfer of remaining Fort Wingate Depot Activity (FWDA) parcels from Army to the Department of Interior, in accordance with the National Defense Authorization Act of 2017, and other Base Realignment and Closure policies, the Army must conduct an Environmental Condition of Property (ECP). This includes an assessment of environmental conditions on the FWDA, to include environmental concerns that are not regulated under the Resources Conservation and Recovery Act (RCRA) Permit administered by the New Mexico Environmental Department (NMED). The policies that require this assessment are found in the Base Realignment and Closure Manual, Army Regulation 200-1, and the Defense Environmental Restoration Program.  

As part of the ECP process, the Army will sample the interior of a statistically relevant number of storage igloos to determine if there is any residual contamination resulting from the storage of munitions. The igloos did not store waste or waste products regulated under RCRA. The Army and NMED have previously disagreed on the authority to regulate the interior of these igloos and the Army intends to use the statistical sampling described in the attached Igloo Interior Inspection Strategy to demonstrate that the igloos should be released from the permit. The Army welcomes NMED comments on this strategy, if any, but understands the fiscal constraints of the state and NMED’s ability to review non-RCRA products. However, should NMED submit comments and if received within 45 days, the Army will strive to meet or address any state concerns prior to implementation of the Strategy.  

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

Sincerely,  

Mark Patterson  
BRAC Environmental Coordinator
### Enclosures

**CF:**
- John Kieling, NMED, HWB
- Dave Cobrain, NMED, HWB
- Ben Wear, NMED, HWB
- Michiya Suzuki, NMED, HWB
- Chuck Hendrickson, U.S. EPA Region 6
- Mark Patterson, BRACD
- Ian Thomas, BRACD
- Sue Ryan, BRACD
- Steven Smith, USACE
- Heather Theel, USACE ERDC
- Dr. Cheryl Montgomery, USACE ERDC
- Dr. Brooke Stevens, USACE ERDC
- Sharlene Begay-Platero, Navajo Nation
- Mark Harrington, Pueblo of Zuni
- Clayton Seoutewa, SW BIA
- Dr. B.J Howerton, BIA
- George Padilla, BIA/NRO
- William Walker, DOI/BIA
- Jennifer Turner, DOI
- Richard Cruz, FWDA/Admin Record (NM)

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