



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

DAIM-ODB

July 13, 2018

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 Environment 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,

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Date: 2018.07.12 11:53:20 -04'00'

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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