



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

June 1, 2021

Base Realignment and Closure Operations Branch

Mr. Kevin Pierard
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Final Hazardous Waste Management Unit Progress Status Report, 2012-2018, Army's Responses to the Approval with Modifications dated March 29, 2021, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974

Dear Mr. Pierard:

This letter is in reply to the New Mexico Environment Department (NMED) Letter of Approval with Modifications dated March 29, 2021, reference number HWB-FWDA-20-005, Final Hazardous Waste Management Unit Progress Status Report, 2012-2018, Army's Response to NMED Letter of Disapproval dated November 20, 2020. The following are Army's response to NMED comments detailing where each comment will be addressed in the upcoming 2020 Hazardous Waste Management Unit Progress Status Report, which is due to NMED on June 30, 2021, and cross referencing the numbered NMED comments.

Based on the NMED Letter of Approval with Modifications dated March 29, 2021, no revisions were required to the 2012-2018 Hazardous Waste Management Unit Progress Status Report and no response was requested. Therefore, this letter is being provided to NMED to acknowledge that the Army is in receipt of the NMED comments, which will be addressed in the upcoming 2020 Hazardous Waste Management Unit Progress Status Report. The Army understands the 2012-2018 Hazardous Waste Management Unit Progress Status Report requires no additional revisions or submittals.

Comments:

1. Discrepancy in the Numbers for the NMED's Comment and the Permittee's Corresponding Response

NMED Comment: Comment 1 in the NMED's November 20, 2020 Disapproval was not numbered in the Response. Consequently, the numbers for the NMED's comment do not match with the numbers for the Permittee's corresponding reply in the Response. NMED's comment numbers and the Permittee's corresponding response must be consistent in future correspondences. No revision required.

Army Response: Concur. Comment numbers will be reviewed for consistency in future submittals. No revision required as stated in the NMED comment.

2. Permittee's Response to NMED's Disapproval Comment 10, dated November 20, 2020

Permittee Statement: "Until recently, laboratory instrumentation did not allow for the N-Nitrosodimethylamine detection limit to meet the screening level. The Army is aware of this issue and recognizes the NMED considers this a data quality exception. The Army is currently working with the NMED on resolution of this issue."

NMED Comment: The February 1, 2021 email from Mr. Wear of NMED to Mr. Cushman of FWDA provides a clarification and direction regarding the analytes where LOQ exceeds the applicable screening levels. The email requests specific information be provided for NMED's evaluation of this recurring issue. The NMED's Approval with Modifications Revised Final 2022 Interim Northern Area Groundwater Monitoring Plan, dated March 8, 2021, directed the Permittee to provide an anticipated date when the requested information will be submitted to NMED in the response letter. This comment serves as a reminder; no revision is required.

Army Response: Concur. No revision required as stated in the NMED comment.

3. Permittee's Response to NMED's Disapproval Comment 15, dated November 20, 2020

Permittee Statement: "The item [(2,000-pound general purpose bomb)] was recovered at approximately 18 feet below ground surface during excavation sloping activities at along the southwestern HWMU boundary."

NMED Comment: Materials potentially presenting an explosive hazard (MPPEH) are potentially present at a depth approximately 18 feet below ground surface (bgs) in the HWMU. If final excavation depths in an excavation grid are shallow, post-excavation digital geophysical mapping (DGM) may not be able to detect potential presence of MPPEH at greater depths below the ground surface. Provide details of the depth detection capabilities of the DGM in the 2020 Hazardous Waste Management Unit Progress Report.

Army Response: Concur. The 2020 Hazardous Waste Management Unit Progress Status Report will include details of the depth of detection capabilities of the DGM equipment, and no revisions are required to the 2012-2018 Hazardous Waste Management Unit Progress Status report as stated in the NMED comment.

If you have questions or require further information, please contact me at George.h.cushman.civ@mail.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,

George H. Cushman IV

George H. Cushman IV
BRAC Environmental Coordinator
Fort Wingate Depot Activity
BRAC Operations Branch
Environmental Division

CF:

Dave Cobrain, NMED, HWB
Ben Wear NMED, HWB
Michiya Suzuki, NMED, HWB
Ian Thomas, BRACD
George H. Cushman IV, BRACD
Alan Soicher, USACE
Michael Falcone, USACE
Saqib Khan, USACE
Dennis Myers, USACE
Admin Record, NM / Ohio