



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

DAIM-ODB

June 11, 2018

Mr. John Kieling
Chief Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

RE: Extension Request for the Final RCRA Facility Investigation, Parcel 13, Fort Wingate Depot Activity, New Mexico

Dear Mr. Kieling,

The purpose of this letter is to request an extension from July 26, 2013 to December 31, 2018 for the submission of the *Final RCRA Facility Investigation Report, Parcel 13, Version 1.0*, for Fort Wingate Depot Activity, New Mexico.

Parcel 13 RFI work plan was approved by NMED on July 26, 2012. The overall field efforts for the Parcel 13 RFI were completed in August 14, 2014 which was after the July 26, 2013 deadline due to water in Lake Knudson (AOC 53) which prevented sampling at the target areas. Other delays at Parcel 13 include contract modifications in 2013 (191 days), cumulative risk discussions/resolutions with NMED (366 days), asbestos and rail resolution with the tribes (190 days), and median values resolution (40 days). The request for using median values versus 95% UCL for initial screening only was resolved May 3, 2018. The Army requested NMED concurrence of using median value for data sets that have fewer than 8 samples collected with detects or fewer than 5 detections. However, the request was denied in an email from NMED dated May 3, 2018 stating that "Parcel 13 - approval of the work plan includes approval of the schedule proposed in the work plan; therefore, the schedule dictates the deadline for document submittal. As such, the document is overdue. FWDA must submit a formal request for an extension of the submittal date."

The Army is seeking extension in time under RCRA Permit Section I.M. due to additional time needed to prepare the document.

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

Sincerely,

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Mark Patterson
BRAC Environmental Coordinator

CF:

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Mr. Mark Harrington, Pueblo of Zuni
Ms. Jennifer Turner, DOI
FWDA Admin Record, Ohio / NM