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## NEW MEXICO ENVIRONMENT DEPARTMENT

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RYAN FLYNN  
Secretary  
BUTCH TONGATE  
Deputy Secretary

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 29, 2015

Mark Patterson  
FWDA, BRAC Coordinator  
P.O. Box 93  
Ravenna, OH 44266

Steve Smith  
USACE FWDA Program Manager  
CESWF-PEC-EF  
819 Taylor Street, Room 3A12  
Fort Worth, TX 76102

**RE: APPROVAL WITH MODIFICATIONS  
PERMITTEE-INITIATED INTERIM MEASURES WORK PLAN  
PARCEL 16, REVISION 1.0  
FORT WINGATE DEPOT ACTIVITY  
MCKINLEY COUNTY, NEW MEXICO  
EPA ID# NM6213820974  
HWB-FWDA-15-002**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has reviewed the revised *Permittee-Initiated Interim Measures Work Plan, Parcel 16; Revision 1.0* (Plan) dated May 6, 2015 for Fort Wingate Depot Activity (Permittee). NMED hereby issues this approval with the following modification.

The Permittee's response to NMED's Disapproval letter (dated March 18, 2015) comment 6 stated "Section 4.3 and Table 4.2 have been revised in the Work Plan to incorporate the collection of discrete samples from the bottom of the removal areas. Sample numbers have been reassigned to reflect discrete sampling and specific analysis was included for each sample. As discussed during the March 25, 2015 conference call with the USACE and NMED, one nine-part composite sample will be collected every 50 feet along the entire perimeter or sidewall of each removal area. The section has also been revised to clarify that the discrete confirmation samples 10 feet from the limits of the excavation are being collected per recommendations in the RFI

Messrs. Patterson and Smith  
May 29, 2015  
Page 2

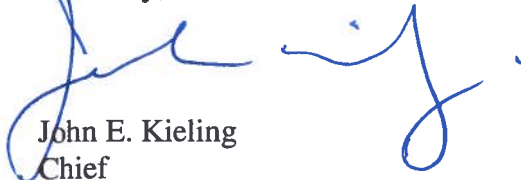
report. The sample numbers have been reassigned to reflect discrete sampling and specific analysis was included for each sample. Figure 4-3 has also been revised." This response is not acceptable. Discrete samples must be collected from the sidewalls of the perimeter of excavation. As stated in the NMED's Disapproval, compositing soil samples may result in contaminant concentrations that are not representative of concentrations remaining in the soil. The Permittee must conduct the following:

1. Collect discrete samples at the base of the excavation using an approximately 20 foot(ft) by 20 ft sampling grid to collect random discrete samples and analyze them for explosives using EPA method 8330B.
2. Collect discrete samples every 20 ft along the sidewalls of the excavations and analyze them for explosives using EPA method 8330B.

The Permittee must address these comments during the implementation of the Plan and include the results in an Investigation Report that must be submitted to NMED no later than **February 27, 2016**.

If you have any questions regarding this letter, please contact Vicky Baca at (505) 476-6059.

Sincerely,



John E. Kieling  
Chief

Hazardous Waste Bureau

cc: Dave Cobrain, NMED, HWB  
Neelam Dhawan, NMED, HWB  
Kristen Vanhorn, NMED, HWB  
Chuck Hendrickson, EPA-6PD-N  
Tony Perry, Navajo Nation  
Val Panteah, Governor, Pueblo of Zuni  
Clayton Seoutewa, Southwest Region BIA  
Rose Duwyenie, Navajo BIA  
Judith Wilson, BIA  
Eldine Stevens, BIA  
Robin White, BIA  
Christy Esler, Sundance Consulting, Inc.

File: FWDA 2015 and Reading  
FWDA-15-002