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 6
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-15-003

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) has reviewed the revised Permittee-Initiated Interim Measures Work Plan, Parcel 6; Revision 1.0 (Plan) dated May 4, 2015 for Fort Wingate Depot Activity (Permittee). NMED and hereby issues this approval with the following modifications.

The Permittee’s response in the revised Plan to NMEDs Disapproval letter dated March 6, 2015 to comments 6 and 8 is not acceptable. Discrete samples must be collected at the perimeters of each excavation. The Permittee must incorporate the following modifications during field execution of the Plan:

1. Permittee’s Response to Comment 6, Former Building 537, Section 4.3. “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 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
sample numbers have been reassigned to reflect discrete sampling and specific analysis was
included for each sample. Figure 4-3 has also been revised.”

NMED Response to Permittee’s Response for Comment 6:
Discrete samples must be collected at the sidewalls of the excavations. 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. In addition, the proposed discrete
sampling is insufficient for a determination of corrective action complete at the site. Therefore,
the Permittee must conduct the following:

a. Collect discrete samples at the base of the excavation using generally a 30-foot (ft) by 30-
ft sampling grid to collect random discrete samples and analyze them for PCBs using
EPA Method 8082A, and SVOCs using EPA Method 8270D.
b. Collect discrete samples in Areas A, F, B and E every 10 ft along the excavation
perimeters and analyze them for PCBs using EPA Method 8082A, and SVOCs using
EPA Method 8270D.
c. Collect discrete samples in Areas C and D every 15 ft along the side walls of the
excavation and analyze them for PCBs using EPA Method 8082A, and SVOCs using
EPA Method 8270D.

2. Permittee’s Response to Comment 8, Feature 4, Section 5.3. “As discussed during the
March 25, 2015 conference call with USACE and NMED, discrete samples will be collected
from the base of each removal area. The sample numbers have been reassigned to reflect
discrete sampling and specific analysis was included for each sample. Figure 5-2 has also been
revised. The location that prompted the comment to collect and analyze for Fluoride was
misidentified and is not located in Feature 4.”

NMED Response to Permittee’s Response for Comment 8:
Discrete samples must be collected at 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. In addition, the proposed
discrete sampling at the base of excavation is insufficient for a determination of corrective action
complete at the site. Therefore, the Permittee must conduct the following:

a. Collect discrete samples every 20 ft at the limits of the excavation and analyze them for
RCRA 8 metals using EPA Method 6010C and Method 7471B; PCBs using EPA Method
8082; SVOCs using EPA Method 8270D; VOCs using EPA Method 8260C; and
pesticides using EPA Method 8081B. However, the work proposed in Feature 4 is the
removal of surface debris; therefore, discrete samples must be collected from the
sidewalls of excavation only in the event debris is located at a depth greater than 1 foot-below ground surface (ft-bgs).

b. Collect discrete samples at the base of the excavation using generally a 20-ft by 20-ft sampling grid to collect random discrete samples and analyze them for RCRA 8 metals using EPA Method 6010C and Method 7471B; PCBs using EPA Method 8082; SVOCs using EPA Method 8270D; VOCs using EPA Method 8260C; and pesticides using EPA Method 8081B.

The Permittee must address these modifications during the implementation of the Plan and include the results in the Investigation Report, which 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-15-003